

EPA Registration Jacket 66330-56

Vol.1

Receipt for Section 3

Registration: ☒ Yes ☐ No

Regulatory Type: ☒ Product Registration - Section 3 ☐ New Use

Application Type: ☒ Amendment ☐ New Use

Company: ☒ BPPD ☐ ACRYSTA LIFESCIENCE (KPM) ACRYSTA CORP. ☒ V

Risk Manager: ☒ Bioscience & Pollution Prevention Division PM Team 01 ☐ V

Product #: Product Name: SLOPE WATER DISPENSIBLE GRANULES

Overpack:

MSL Type: MSL Type:

Application Date: 18-Jul-2006 ☒ GPP Rec'd Date: 19-Jul-2006 ☒

Prod End Date: 19-Jul-2006 ☒ Risk Manager Send Date: 20-Jul-2006 ☒

HPS Due Date: Registered Due Date:

GPP Target Date:

Fast Track: ☐ New Ingredient: ☐

Receipt Description:

added additional packaging size and responded to EPA reviewer comment.

JUL 20 2006 BPPD

New Ingredient Request Date:

New Ingredient Request Date:

New Ingredient Request Date:

New Ingredient Request Date:

Print Letter

Enter More Information

Tracking

2/20/06 BPPD
Included

Receipt Content

MySpace.com... EPA OPP/EN... Travello Beth... Conference R... 3:23 PM

Fast Team (Resub)

(Chris P.)

CAROL F.

Note, only one submission attached (5796840) and
no registrant's letter.

7/24/06
LH

ATO
JUL 26 2006

sdh
1

Receipt for Section 3

Regulatory Type: ☒ Product Registration - Section 3 ☐ For Service ☒ Yes ☐ No

Application Type: ☒ Amendment ☐ Draft ☐ Yes ☐ No

Company: 66330 ARYSTA LIFESCIENCE NORTH AMERICA CORP V

Risk Manager: Biological & Pollution Prevention Division, PM Team 3 ☒

Product #: 66330-56 Product Name: ENDORSE WATER DISPERSIBLE GRANULES

Overlaid: ☐

No Too Section 3: ☐ No Too Product Name: ☐

Application Date: 10-May-2006 ☒ OPP Rec'd Date: 15-May-2006 ☒

Print End Date: 15-May-2006 ☒ Risk Manager Send Date: 18-May-2006 ☒

FTS Due Date: ☐ Registered Due Date: ☐

OPP Target Date: ☐

Field Track: ☐ New Registered: ☐

Receipt Description: MAY 22 2006 *PPD*

Print Letter
Enter More Information
Tracking

EPA OPPIN Main - Co... 3:24 PM

301- FAST Team TON

Teamleader
Note to Diana & RAL:

The cover letter makes reference to 66330-56 & 68173-3 ~~however~~
~~there are no draft labels attached for 66330-56~~

~~The only labels attached are for 68173-3, these being an~~
~~open submission~~

Action: Diana, pls. create a receipt for 68173-3.

RAL: pls. contact consultant upon receipt & have
them to fax a label for 66330-56.

LH 5/30/06

AIO
JUN 1 2006
2Adh

S: 768150		Regulatory Type: Product Registration - Section 3		Payable: <input checked="" type="radio"/> Yes <input type="radio"/> No		<input type="button" value="Print Letter"/> <input type="button" value="Enter More Information"/> <input type="button" value="Tracking"/>
Application Type: Amendment		Billable: <input checked="" type="radio"/> Yes <input type="radio"/> No				
Company: 66330 ARYSTA LIFESCIENCE NORTH AMERICA CORP		<input checked="" type="checkbox"/>				
Risk Manager: Biologicals & Pollution Prevention Division, PM Team 91						
Product #: 66330-56		Product Name: ENDORSE WATER DISPERSIBLE GRANULES				
Me Top Section 3		Me Top Product Name:				
Application Date: 19-Dec-2005 <input checked="" type="checkbox"/>		OPP Rec'd Date: 21-Dec-2005 <input checked="" type="checkbox"/>				
Front End Date: 22-Dec-2005 <input checked="" type="checkbox"/>		Risk Manager Send Date: <input checked="" type="checkbox"/>				
FPS Due Date:		Negotiated Due Date:				
OPP Target Date:						
Fast Track: <input type="checkbox"/>		New Product: <input type="checkbox"/>				
Recent Description:						
ADDED NEW USE ON ORNAMENTALS						
Form A: <input type="checkbox"/>		Form B: <input type="checkbox"/>		Form C: <input type="checkbox"/>		

EPA...

N7A06 11:24 AM

Doina Bujor, Project Manager
Registrations and Regulatory Affairs
Arysta LifeScience North America
Park West Two
15401 Weston Parkway, Suite 150
Cary, NC 27513

JUL 24 2006

Subject: Label Amendment Resubmissions Dated May 10, 2006
Product Name: ENDORSE® Water Dispersible Granules
EPA Registration Numbers: 66330-56 and 68173-3

Dear Ms. Bujor:

The amendments referred to above, submitted in connection with registration under FIFRA section 3(c)(5), are acceptable provided that you:

Submit five (5) copies of your final printed labeling before you release the product for shipment. Final printed labeling means the label or labeling of the product when distributed or sold. Clearly legible reproductions or photo reductions will be accepted for unusual labels, such as those silk-screened directly onto glass or metal containers or large bags or drum labels.


If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

Also, the alternate brand name for 66330-56, ENDORSE Water Dispersible Granules, "VERANDA Water Dispersible Granules," is accepted.

Doina Bujor, Project Manager
Label Amendment Resubmission Dated May 10, 2006
Page Two (2)

Stamped copies of the labels are enclosed for your records.

Sincerely,



Sheryl K. Reilly, Ph.D., Chief
Biochemical Pesticides Branch
Biopesticides and Pollution
Prevention Division (7511C)

Enclosures

Alternate Brand Name for ENDORSE Water Dispersible Granules:

- VERANDA™ Water Dispersible Granules

ENDORSE® Water Dispersible Granules

For use on Turf and Ornamentals

GROUP	19	FUNGICIDE
-------	----	-----------

ACTIVE INGREDIENT:

Polyoxin D zinc salt 11.3%

OTHER INGREDIENTS: 88.7%

TOTAL..... 100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE SIDE/BACK PANEL FOR FIRST AID AND ADDITIONAL PRECAUTIONARY
STATEMENTS.

For Product Information Call 1-866-761-9397

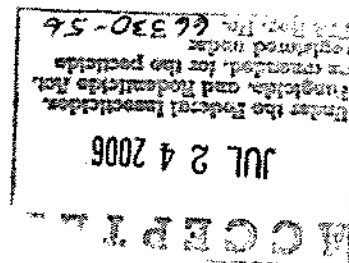
EPA Reg. No. 66330-56 _____

EPA Est. No. _____

Net Content: 1 lb
2 lbs 6.4 oz (2.4 lb)

Produced for:

Arysta LifeScience North America Corporation
15401 Weston Parkway, Suite 150
Cary, NC 27513



FIRST AID	
If on skin or clothing	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15-20 minutes.• Call a poison control center or doctor for treatment advice.
If in eyes	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice.
If swallowed	<ul style="list-style-type: none">• Call poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by the poison control center or doctor.• Do not give anything by mouth to an unconscious person.
If inhaled	<ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.• Call a poison control center or doctor for further treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE: CALL 1-800-228-5635 Ext. 174	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if absorbed through the skin, swallowed or inhaled. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust or spray mist. Wash thoroughly with soap and water after handling. Remove and wash contaminated clothing before reuse.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

All mixers, loaders, applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Socks
- Shoes
- Chemical-Resistant gloves made of any waterproof material

User safety requirement

Follow the manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables are available, use detergent and hot water. Keep and wash PPE separately from other laundry.

User safety Recommendations

- Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This pesticide is moderately toxic to aquatic invertebrates and fish. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate. Do not allow runoff into lakes, streams, ponds or public waterways. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas.

Granules exposed on soil surface may be hazardous to fish and aquatic invertebrates. Collect granules spilled during loading.

Observe the most restrictive of the labeling limitations and precautions of all products used in mixtures.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

For any requirements specific to your State or Tribe, consult the State or Tribal agency responsible for pesticide regulation.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions on this label about personal protective equipment (PPE), notification to workers, and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow entry into treated areas during the restricted entry interval (REI) of 4 hours unless wearing appropriate PPE.

PPE required for early entry into treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water is: coveralls, socks, shoes, chemical resistant gloves made of waterproof material.

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in the box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries or greenhouses. Keep children and pets out of treated area until sprays have dried.

GENERAL INFORMATION

ENDORSE Water Dispersible Granules is for use in controlling or suppressing certain diseases on ornamentals, golf courses, residential lawns, parks, and commercial and institutional grounds composed of cool and warm season grasses such as Bluegrass, Bentgrass, Fescue, Ryegrass, Zoysiagrass, or their mixtures.

Apply ENDORSE Water Dispersible Granules as a preventive or curative treatment in conjunction with good turf and ornamental management practices.

RESISTANCE MANAGEMENT RECOMMENDATIONS

ENDORSE Water Dispersible Granules contains a Group 19 fungicide. Fungal isolates with acquired resistance to Group 19 may eventually dominate the fungal population if Group 19 fungicides are used repeatedly in the same field or in successive years as the primary method of control for targeted species. This may result in partial or total loss of control of those species by ENDORSE Water Dispersible Granules or other Group 19 Fungicides.

To delay fungicide resistance, consider:

- Avoiding the consecutive use of ENDORSE Water Dispersible Granules or other target site of action Group 19 fungicides that have a similar target site of action, on the same pathogens.
- Using tank-mixtures or premixes with fungicides from different target site of action Groups as long as the involved products are all registered for the same use and are both effective at the tank mix or prepack rate on the pathogen(s) of concern.
- Basing fungicide use on a comprehensive IPM program.
- Monitoring treated fungal populations for loss of field efficacy.
- Contacting your local extension specialist, certified crop advisors, and/or manufacturer for fungicide resistance management and/or IPM recommendations for specific crops and resistant pathogens.

MIXING AND APPLICATION

When diseases not specified on this label are present or expected, it is appropriate to mix ENDORSE Water Dispersible Granules with appropriately labeled fungicides. When tank mixing ENDORSE Water Dispersible Granules with other products, observe all precautions and limitations on each separate product label. It is always advisable to conduct a tank mix compatibility test when you plan to mix this product with other products. To determine the physical compatibility of this product with other products, use a jar test. Using a quart jar, add the proportionate amounts of the products to approximately one quart of water with agitation. Add dry formulations first, then flowables, then emulsifiable concentrates last. After thorough mixing, allow this mixture to stand for 5 minutes. If the combination remains mixed or can be readily remixed, it is physically compatible. Once compatibility has been proven, use the same procedure for adding required ingredients to the spray tank. To assess the potential for phytotoxicity, test tank mixtures on a small number of plants prior to more widespread application.

Do not apply this product through any type of irrigation system.

Mixing instructions for ENDORSE Water Dispersible Granules:

- Fill spray tank with water to $\frac{1}{2}$ of the intended final volume.
- Start spray tank agitation.
- Add the appropriate amount of product to the tank according to the rates in the following tables. Follow the directions above for mixing other products in the spray tank.
- Agitate to ensure thorough mixing while adding the remaining required water.
- DO NOT allow the spray mixture to stand without agitation.

Mix only the amount of spray solution needed to treat the desired area.

For optimum control of labeled diseases, apply ENDORSE Water Dispersible Granules with sufficient water to provide a thorough coverage.

With the exception for treatment of Fairy Ring, irrigation or rainfall soon after treatment with ENDORSE Water Dispersible Granules will decrease disease control. For best control, do not irrigate for 12 hours after treatment.

TURF GRASSES		
Disease	Rate	Application Notes
*Brown Patch *Large Patch (ALL STATES)	2.4 lbs /acre (0.27 lb ai/acre in a minimum of 88 gallons of water)	<ul style="list-style-type: none"> Repeat treatment on a 7-14 day schedule where environmental conditions are conducive to development of diseases.¹ When symptoms are present, best control will be achieved by using a shorter interval. For best results apply after mowing.
**Cool Weather Brown Patch (Yellow Patch) (<i>Rhizoctonia cerealis</i>) **Foliar and Basal Anthracnose (<i>Collectotrichum graminicola</i>) **Gray Snow Mold (<i>Typhula ishikariensis</i> and <i>Typhula incarnate</i>) **Leaf Spot/Melting Out (<i>Dreschlera poae</i>) **Pink Snow Mold (<i>Microdochium solani</i>) **Red Thread (<i>Laetisaria fuciformis</i>) **Rhizoctonia Damping Off (<i>Rhizoctonia solani</i>) **Zoysia Patch (<i>Rhizoctonia solani</i>) (EXCEPT CALIFORNIA.)		
***Gray Leaf Spot (<i>Pyricularia grisea</i>). EXCEPT CALIFORNIA.		
****Fairy Ring (including <i>Marasmius</i> spp., <i>Lepiota</i> , spp. and <i>Agarius</i> spp.) (ALL STATES)	1 oz/1000 square feet in minimum of 2 gallons of water (0.27 lb ai/acre in 88 gallons of water)	<ul style="list-style-type: none"> Make two-three applications on a 7-day interval schedule. Use a penetrating wetting agent. Immediately following application, water in the treatment with sufficient irrigation (0.5-1") to wet the active root zone.
Notes: <ul style="list-style-type: none"> Control ** Aids in control *** Aids in suppression ****Suppression and short term control ¹ Consult your local extension agent or local recommendations for information relating to proper timing for control of these diseases. Use in alternation with fungicides that have different modes of action. 		

ORNAMENTALS		
Follar Diseases	Rate	Application Notes
*Botrytis blight (<i>Botrytis cinerea</i>)	0.25 – 0.5 lb/100 gal/acre 0.03 – 0.06 lb ai/100 gal/acre	<ul style="list-style-type: none"> • Apply as a foliar spray every 7 – 10 days. • Apply prior to disease development and when conditions are conducive to disease development.¹
*Alternaria blight (<i>Alternaria panax</i>)	0.5 lb/100 gal 0.06 lb ai/100 gal/acre	
Root and Crown Diseases	Rate	Application Notes
*Rhizoctonia root and crown rot (<i>Rhizoctonia solani</i>)	0.25 – 0.5 lb/100 gal/acre 0.03 – 0.06 lb ai/100 gal/acre	<ul style="list-style-type: none"> • Apply as a soil drench every 14 – 28 days.
Notes: <ul style="list-style-type: none"> • * Control • ¹Consult your local extension agent or local recommendations for information relating to proper timing for control of these diseases. • Use in alternation with fungicides that have different modes of action. 		

STORAGE AND DISPOSAL
Do not contaminate water, food or feed by storage or disposal.
PESTICIDE STORAGE: Store in dry place away from food or feed.
PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.
CONTAINER DISPOSAL: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed, by State and local authorities, by burning. If burned, stay out of smoke.

FOR 24-HOUR CHEMICAL EMERGENCY (Spill, Leak, Fire or Accident) ASSISTANCE: CALL CHEMTREC 1-800-424-9300
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CONDITIONS OF SALE

1. Arysta LifeScience North America Corporation warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in accordance with the Directions for Use under normal conditions of use.
2. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Arysta LifeScience North America. **ARYSTA LIFESCIENCE NORTH AMERICA DISCLAIMS ALL OTHER WARRANTIES, EXPRESSED OR IMPLIED, INCLUDING ANY WARRANTY OF FITNESS OR MERCHANTABILITY. TO THE EXTENT PERMITTED BY LAW, SELLER SHALL NOT BE LIABLE FOR CONSEQUENTIAL SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. TO THE EXTENT PERMITTED BY LAW, SELLER'S LIABILITY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE. ARYSTA LIFESCIENCE NORTH AMERICA DOES NOT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTY, GUARANTEE OR REPRESENTATION CONCERNING THIS PRODUCT.**
3. Critical and unforeseeable factors beyond Arysta LifeScience North America's control prevent Arysta LifeScience North America from eliminating all risks in connection with the use of this product. Such risks include, but are not limited to, damage to plants and crops to which the product is applied, lack of complete control, and damage caused by drift to other plants or crops. Such risks occur even though the product is reasonably fit for the use stated on the label and even though label directions are followed. Except as stated in 1 above, to the extent permitted by law, Buyer and User acknowledge and assume all risks and liabilities resulting from handling, storage, and use of this product.

ENDORSE[®] is a registered trademark of Arysta LifeScience North America Corporation.



"Bujor, Doina"
<doina.bujor@arystallifescience.com>

07/18/2006 01:14 PM

To Carol Frazer/DC/USEPA/US@EPA

cc

bcc

Subject FW: EPA Reg. No. 68173-3 and 66330-56 Label Amendments Dated December 19, 2005

Doina Bujor

Regulatory Manager - Fungicides
Regulatory Affairs
15401 Weston Parkway, Suite 150
Cary, NC 27513
Tel: 919-678-4879
Fax: 919-678-2196
doina.bujor@arystallifescience.com

Dear Carol,

Attached are the updated labels, the cover letter and the 8570-1 form. I sent them by fed-ex also but I wanted to give you a heads-up. Please let me know if I can do anything else to expedite the approval. Thank you for your help.

Best regards,

Doina Bujor
Regulatory Manager
Arysta LifeScience North America
919-678-4879
doina.bujor@arystallifescience.com



ENDORSE WDG Master Label - Clean - PM050906b.pdf



Kaken ENDORSE WDG - Redline - PM050406b.pdf



Kaken ENDORSE WDG - Clean - PM050406b.pdf



ENDORSE WDG Master Label - Redline - PM050906b.pdf



Cover.pdf



Arysta LifeScience

July 18, 2006

Sheryl K. Reilly
Chief, Biochemical Pesticides Branch
Biopesticide and Pollution Prevention Division
Office of Pesticide Programs (7511P)
U.S. Environmental Protection Agency
One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202
(703)308-8733

RE: ENDORSE WDG
(EPA Reg. No. 68173-3 and EPA Reg. No. 66330-56)

Dear Dr. Reilly:

The present submission is in response to the EPA e-mail dated July 11, 2006 regarding final changes to the Endorse WDG (EPA Reg. No. 68173-3 and 66330-56) labels.

Since the product will be sold in two different markets, turf at a rate of 2.4 lb/acre and ornamentals at rates lower or equal to 1 lb/acre we added a new packaging size to the regulatory label. The product will be sold as Endorse WDG in packages of 2 lb 6.4 oz (2.4 lb) for the turf market and as Veranda WDG in packages of 1 lb for the ornamental market.

The present submission contains:

1. Cover letter
2. Application for pesticide (EPA form 8570-1)
3. One copy of the red-line label for 68173-3
4. One copy of the red-line label for 66330-56
5. Five copies of the clean label for 68173-3
6. Five copies of the clean label for 66330-56

Please notify us when these labels are approved. If you have any questions please contact me at (919)678-4879 or by e-mail at doina.bujor@arystalifescience.com


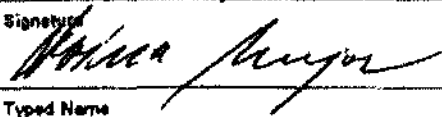
Sincerely,

Doina Bujor
Regulatory Manager - Polyoxin
Regulatory Affairs
Arysta LifeScience North America Corporation



Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060

		United States Environmental Protection Agency Washington, DC 20460		<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
Application for Pesticide - Section I					
1. Company/Product Number 66330-56		2. EPA Product Manager Denise Greenway		3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted	
4. Company/Product (Name) ENDORSE Water Dispersible Granules		PMS 91			
5. Name and Address of Applicant (Include ZIP Code) Arysta LifeScience North America Corporation 15401 Weston Parkway, Suite 150 Cary, NC 27513 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____			
Section - II					
<input type="checkbox"/> Amendment - Explain below.		<input checked="" type="checkbox"/> Final printed labels in response to 7/11/2006 Agency letter dated _____			
<input type="checkbox"/> Resubmission in response to Agency letter dated _____		<input type="checkbox"/> "Me Too" Application.			
<input type="checkbox"/> Notification - Explain below.		<input checked="" type="checkbox"/> Other - Explain below.			
Explanation: Use additional page(s) if necessary. (For section I and Section II.) Added additional packaging size and responded to EPA reviewer comment					
Section - III					
1. Material This Product Will Be Packaged In:					
Child-Resistant Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1 lb; 2 lb 6.4 oz (2.4 lb)		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			
Section - IV					
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Doina Bujor		Title Regulatory Manager		Telephone No. (Include Area Code) 919-678-4879	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					5. Date Application Received (Stamped)
2. Signature 		3. Title Regulatory Manager			
4. Typed Name Doina Bujor		6. Date July 18, 2006			

Alternate Brand Name for ENDORSE Water Dispersible Granules:

- VERANDA™ Water Dispersible Granules

ENDORSE® Water Dispersible Granules

For use on Turf and Ornamentals

GROUP	19	FUNGICIDE
-------	----	-----------

ACTIVE INGREDIENT:

Polyoxin D zinc salt 11.3%

OTHER INGREDIENTS: 88.7%

TOTAL..... 100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE SIDE/BACK PANEL FOR FIRST AID AND ADDITIONAL PRECAUTIONARY
STATEMENTS.

For Product Information Call 1-866-761-9397

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

~~Causes moderate eye irritation. Harmful if absorbed through the skin, swallowed or inhaled. Avoid contact with skin, eyes or clothing. Avoid breathing dust or spray mist. Wash thoroughly with soap and water after handling. Remove and wash contaminated clothing before reuse.~~

EPA Reg. No. 66330-56

Produced for:

EPA Est. No.

Arysta LifeScience North America Corporation

Net Content: 1 lb

15401 Weston Parkway, Suite 150

2 lbs 6.4 oz (2.4 lb)

Cary, NC 27513

3518

FIRST AID	
If on skin or clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
If swallowed	<ul style="list-style-type: none"> • Call poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
<p>FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE: CALL 1-800-228-5635 Ext. 174</p>	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if absorbed through the skin, swallowed or inhaled. Causes moderate eye irritation.
~~Harmful if absorbed through the skin, swallowed or inhaled.~~ Avoid contact with skin, eyes or clothing. Avoid breathing dust or spray mist. Wash thoroughly with soap and water after handling. Remove and wash contaminated clothing before reuse.

53
53
53
19

PERSONAL PROTECTIVE EQUIPMENT (PPE)

All mixers, loaders, applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Socks
- Shoes
- Chemical-Resistant gloves made of any waterproof material

User safety requirement

Follow the manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables are available, use detergent and hot water. Keep and wash PPE separately from other laundry.

User safety Recommendations

- Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This pesticide is moderately toxic to aquatic invertebrates and fish. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate. Do not allow runoff into lakes, streams, ponds or public waterways. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas.

Granules exposed on soil surface may be hazardous to fish and aquatic invertebrates. Collect granules spilled during loading.

Observe the most restrictive of the labeling limitations and precautions of all products used in mixtures.

EPA Reg. No. 68173 _____

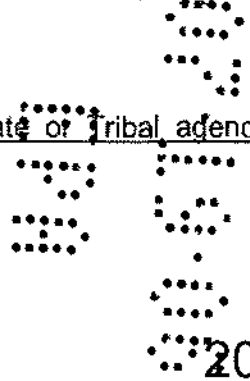
EPA EST. No. _____

Net weight 2 pounds, 6.4 ounces (2.4 lbs)

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

For any requirements specific to your State or Tribe, consult the State or Tribal agency responsible for pesticide regulation.



NON-AGRICULTURAL USE REQUIREMENTS

The requirements in the box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries or greenhouses. Keep children and pets out of treated area until sprays have dried.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions on this label about personal protective equipment (PPE), notification to workers, and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow entry into treated areas during the restricted entry interval (REI) of 4 hours unless wearing appropriate PPE.

PPE required for early entry into treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water is: coveralls, socks, shoes, chemical resistant gloves made of waterproof material.

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in the box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries or greenhouses. Keep children and pets out of treated area until sprays have dried.

GENERAL INFORMATION

~~ENDORSE Water Dispersible Granules is NOT for use on turf being grown (1) for sale or other commercial use as sod, (2) for commercial seed production, or (3) for research purposes.~~

ENDORSE Water Dispersible Granules is for use in controlling or suppressing certain diseases on ornamentals, golf courses, residential lawns, parks, and commercial and institutional grounds composed of cool and warm season grasses such as Bluegrass, Bentgrass, Fescue, Ryegrass, Zoysiagrass, or their mixtures.

~~ENDORSE Water Dispersible Granules is a systemic, foliar applied turf fungicide for control of Brown Patch and Large Patch caused by *Rhizoctonia* spp. and for the suppression and short term control of Fairy Ring caused by the various *Basidiomycetes* fungal pathogens including *Marasmius* spp., *Lepiota* spp. and *Agarius* spp. (ALL STATES)~~

ENDORSE Water Dispersible Granules also controls Cool Weather Brown Patch (Yellow Patch) (*Rhizoctonia cerealis*), Foliar and Basal Anthracnose (*Colletotrichum graminicola*), Gray Snow Mold (*Typhula ishikariensis* and *Typhula incarnata*), Leaf Spot/Melting Out (*Dracophila poae*), Pink Snow Mold (*Microdochium nivale*), Red Thread (*Laetisaria fuciformis*), *Rhizoctonia* Damping Off (*Rhizoctonia solani*), and Zoysia Patch (*Rhizoctonia solani*) on cool and warm season turf grasses.

~~(EXCEPT CALIFORNIA)~~

~~ENDORSE Water Dispersible Granules also aids in the suppression of Gray Leaf Spot (*Pyricularia grisea*). (EXCEPT CALIFORNIA)~~

Apply ENDORSE Water Dispersible Granules as a preventive or curative treatment in conjunction with good turf and ornamental management practices.

~~ENDORSE Water Dispersible Granules also controls Botrytis blight (*Botrytis cinerea*), Alternaria blight (*Alternaria* spp.) and Rhizoctonia root and crown rot (*Rhizoctonia solani*) on Ornamentals.~~

RESISTANCE MANAGEMENT RECOMMENDATIONS

ENDORSE Water Dispersible Granules contains a Group 19 fungicide. Fungal isolates with acquired resistance to Group 19 may eventually dominate the fungal population if Group 19 fungicides are used repeatedly in the same field or in successive years as the primary method of control for targeted species. This may result in partial or total loss of control of those species by ENDORSE Water Dispersible Granules or other Group 19 Fungicides.

To delay fungicide resistance, consider:

- Avoiding the consecutive use of ENDORSE Water Dispersible Granules or other target site of action Group 19 fungicides that have a similar target site of action, on the same pathogens.
- Using tank-mixtures or premixes with fungicides from different target site of action Groups as long as the involved products are all registered for the same use and are both effective at the tank mix or prepack rate on the pathogen(s) of concern.
- Basing fungicide use on a comprehensive IPM program.
- Monitoring treated fungal populations for loss of field efficacy.
- Contacting your local extension specialist, certified crop advisors, and/or manufacturer for fungicide resistance management and/or IPM recommendations for specific crops and resistant pathogens.

MIXING AND APPLICATION

When diseases not specified on this label, such as Dollar Spot, are present or expected, it is appropriate to mix ENDORSE Water Dispersible Granules with appropriately labeled fungicides. When tank mixing ENDORSE Water Dispersible Granules with other products, observe all precautions and limitations on each separate product label. It is always advisable to conduct a tank mix compatibility test when you plan to mix this product with other products. To determine the physical compatibility of this product with other products, use a jar test. Using a quart jar, add the proportionate amounts of the products to approximately one quart of water with agitation. Add dry formulations first, then flowables, then emulsifiable concentrates last. After thorough mixing, allow this mixture to stand for 5 minutes. If the combination remains mixed or can be readily remixed, it is physically compatible. Once compatibility has been proven, use the same procedure for adding required ingredients to the spray tank. To assess the potential for phytotoxicity, test tank mixtures on a small number of plants prior to more widespread application.

Do not apply this product through any type of irrigation system.

Mixing instructions for ENDORSE Water Dispersible Granules:

- Fill spray tank with water to $\frac{1}{2}$ of the intended final volume.
- Start spray tank agitation.
- Add the appropriate amount of product to the tank ~~(refer to Rate and Schedule section of label)~~ according to the rates in the following tables. Follow the directions above for mixing other products in the spray tank.
- Agitate to ensure thorough mixing while adding the remaining required water.
- DO NOT allow the spray mixture to stand without agitation.

Mix only the amount of spray solution needed to treat the desired area.

For optimum control of labeled diseases, apply ENDORSE Water Dispersible Granules with sufficient water to provide a thorough coverage.

With the exception for treatment of Fairy Ring, irrigation or rainfall soon after treatment with ENDORSE Water Dispersible Granules will decrease disease control. For best control, do not irrigate for 12 hours after treatment.

For best results, apply after mowing.

RATE AND SCHEDULE

Apply 2.4 lbs (1 bag) of ENDORSE Water Dispersible Granules per acre (0.27 lbs active ingredient/acre) in a minimum of 88 gallons of water per acre.

Repeat treatment on a 7-14 day schedule as necessary when environmental conditions are conducive to development of disease. When disease symptoms are present, best control will be achieved by using a shorter interval.

TURF GRASSES		
Disease	Rate	Application Notes
<p>*Brown Patch</p> <p>*Large Patch</p> <p>(ALL STATES)</p> <p>**Cool Weather Brown Patch (Yellow Patch) (<i>Rhizoctonia cerealis</i>);</p> <p>**Foliar and Basal Anthracnose (<i>Collectotrichum graminicola</i>);</p> <p>**Gray Snow Mold (<i>Typhula ishikariensis</i> and <i>Typhula incarnate</i>);</p> <p>**Leaf Spot/Melting Out (<i>Dreschlera poae</i>);</p> <p>**Pink Snow Mold (<i>Microdochium solani</i>); and</p> <p>**Red Thread (<i>Laetisaria fuciformis</i>)</p> <p>**Rhizoctonia Damping Off (<i>Rhizoctonia solani</i>)</p> <p>**Zoysia Patch (<i>Rhizoctonia solani</i>) on cool and warm season turf grasses.</p> <p>(EXCEPT CALIFORNIA.)</p> <p>***Gray Leaf Spot (<i>Pyricularia grisea</i>). EXCEPT CALIFORNIA.</p>	<p>2.4 lbs (1 bag)/acre</p> <p>(0.27 lb active ingredient ai/acre) in a minimum of 88 gallons of water/acre)</p>	<ul style="list-style-type: none"> • Repeat treatment on a 7-14 day schedule where environmental conditions are conducive to development of diseases. • When symptoms are present, best control will be achieved by using a shorter interval. • For best results apply after mowing.
<p>****Fairy Ring (including <i>Marasmius</i> spp., <i>Lepiota</i>, spp. and <i>Agarius</i> spp.)</p> <p>(ALL STATES)</p>	<p>1 oz/1000 square feet in minimum of 2 gallons of water (0.275 lb ai/acre) (in 88 gallons of water/acre)</p>	<ul style="list-style-type: none"> • Make two-three applications on a 7-day interval schedule. • Use a penetrating wetting agent (such as primer or equivalent). • Immediately following application, water in the treatment with sufficient irrigation (0.5-1") to wet the active root zone.
Notes:		

- * Control
- ** Aids in control
- *** Aids in suppression
- **** Suppression and short term control:
- † Consult your local extension agent or local recommendations for information relating to proper timing for control of these diseases.
- Use in alternation with fungicides that have different modes of action.

ORNAMENTALS		
Foliar Diseases	Rate	Application Notes
* <u>Botrytis blight (<i>Botrytis cinerea</i>)</u>	0.25 – 0.5 lb/100 gal/acre 0.03 – 0.06 lb ai/100 gal/acre	<ul style="list-style-type: none"> • Apply as a foliar spray every 7 – 10 days. • Apply prior to disease development and when conditions are conducive for disease development.¹
* <u>Alternaria blight (<i>Alternaria panax</i>)</u>	0.5 lb/100 gal 0.06 lb ai/100 gal/acre	
Root and Crown Diseases	Rate	Application Notes
* <u>Rhizoctonia root and crown rot (<i>Rhizoctonia solani</i>)</u>	0.25 – 0.5 lb/100 gal/acre 0.03 – 0.06 lb ai/100 gal/acre	<ul style="list-style-type: none"> • Apply as a soil drench every 14 – 28 days.
Notes: <ul style="list-style-type: none"> • * Control • ¹Consult your local extension agent or local recommendations for information relating to proper timing for control of these diseases. • Use in alternation with fungicides that have different modes of action. 		

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store in dry place away from food or feed.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed, by State and local authorities, by burning. If burned, stay out of smoke.

**FOR 24-HOUR CHEMICAL EMERGENCY
(Spill, Leak, Fire or Accident) ASSISTANCE:
CALL CHEMTREC 1-800-424-9300**

CONDITIONS OF SALE

1. Arysta LifeScience North America Corporation warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in accordance with the Directions for Use under normal conditions of use.
2. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Arysta LifeScience North America. **ARYSTA LIFESCIENCE NORTH AMERICA DISCLAIMS ALL OTHER WARRANTIES, EXPRESSED OR IMPLIED, INCLUDING ANY WARRANTY OF FITNESS OR MERCHANTABILITY. TO THE EXTENT PERMITTED BY LAW, SELLER SHALL NOT BE LIABLE FOR CONSEQUENTIAL SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. TO THE EXTENT PERMITTED BY LAW, SELLER'S LIABILITY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE. ARYSTA LIFESCIENCE NORTH AMERICA DOES NOT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTY, GUARANTEE OR REPRESENTATION CONCERNING THIS PRODUCT.**
3. Critical and unforeseeable factors beyond Arysta LifeScience North America's control prevent Arysta LifeScience North America from eliminating all risks in connection with the use of this product. Such risks include, but are not limited to, damage to plants and crops to which the product is applied, lack of complete control, and damage caused by drift to other plants or crops. Such risks occur even though the product is reasonably fit for the use stated on the label and even though label directions are followed. Except as stated in 1 above, to the extent permitted by law, Buyer and User acknowledge and assume all risks and liabilities resulting from handling, storage, and use of this product.

ENDORSE® is a registered trademark of Arysta LifeScience North America Corporation.

Produced for:

Arysta LifeScience North America Corporation
100 First Street, Suite 1700
San Francisco, CA

Time A (6 hr): Total Number of Nematodes

		[Chloropicrin]				
		1(x)	2(0.75x)	3(0.5x)	4(0.25x)	O(0.0x)
[MI]	A(x)	79	69	100	190	332
	B(0.75x)	90	143	128	212	248
	C(0.5x)	161	67	125	140	425
	D(0.25x)	63	126	184	242	567
	O(0.0x)	78	448	241	215	495

Mean Nematode Number per Treatment

		[Chloropicrin]				
		1(x)	2(0.75x)	3(0.5x)	4(0.25x)	O(0.0x)
[MI]	A(x)	26	23	33	63	111
	B(0.75x)	30	48	43	71	83
	C(0.5x)	54	22	42	47	142
	D(0.25x)	21	42	61	81	189
	O(0.0x)	26	149	80	72	165

Percent of Control for Each Treatment

		[Chloropicrin]				
		1(x)	2(0.75x)	3(0.5x)	4(0.25x)	O(0.0x)
[MI]	A(x)	16	14	20	38	67
	B(0.75x)	18	29	26	43	50
	C(0.5x)	33	14	25	28	86
	D(0.25x)	13	26	37	49	115
	O(0.0x)	16	91	49	43	100

Evidence for Synergistic or Antagonistic Fumigant Interaction

		[Chloropicrin]				
		1(x)	2(0.75x)	3(0.5x)	4(0.25x)	O(0.0x)
[MI]	A(x)	-	+	-	-	33
	B(0.75x)	-	+	-	-	50
	C(0.5x)	-	+	+	+	14
	D(0.25x)	+	+	+	-	0
	O(0.0x)	84	9	51	57	

- Antagonistic Control

+ Synergistic Control

Time B (24 hr. White Label)

TRT	BLK			Total	Mean	%*
	1	2	3			
A1	4	11	8	23	7.7	4.6
A2	6	20	6	32	10.7	6.5
A3	0	2	15	17	5.7	3.4
A4	5	0	0	5	1.7	1.0
AO	27	41	30	98	32.7	19.8
B1	7	0	2	9	3.0	1.8
B2	4	2	9	15	5.0	3.0
B3	0	4	5	9	3.0	1.8
B4	14	2	5	21	7.0	4.2
BO	1	4	0	5	1.7	1.0
C1	6	3	4	13	4.3	2.6
C2	3	18	18	39	13.0	7.9
C3	9	2	0	11	3.7	2.2
C4	14	2	1	17	5.7	3.4
CO	6	10	26	42	14.0	8.5
D1	12	36	8	56	18.7	11.3
D2	27	7	20	54	18.0	10.9
D3	9	1	25	35	11.7	7.1
D4	12	10	2	24	8.0	4.8
DO	8	38	30	76	25.3	15.4
O1	136	66	62	264	88.0	53.3
O2	149	29	43	221	73.7	44.6
O3	46	66	111	223	74.3	45.1
O4	136	135	71	342	114.0	69.1
OO	310	118	189	617	205.7	

*Percent of Control (OO - Mean for 6 hr and 24 hr trt's combined)

Alternate Brand Name for ENDORSE Water Dispersible Granules:

- VERANDA™ Water Dispersible Granules

ENDORSE® Water Dispersible Granules

For use on Turf and Ornamentals

GROUP	19	FUNGICIDE
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ACTIVE INGREDIENT:

Polyoxin D zinc salt 11.3%

OTHER INGREDIENTS: 88.7%

TOTAL..... 100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE SIDE/BACK PANEL FOR FIRST AID AND ADDITIONAL PRECAUTIONARY
STATEMENTS.

For Product Information Call 1-866-761-9397

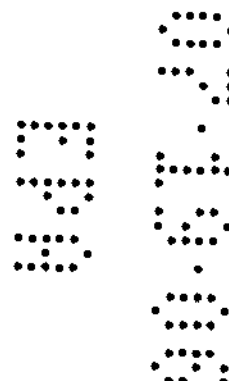
EPA Reg. No. 66330-56_____

EPA Est. No. _____

Net Content: 1 lb
2 lbs 6.4 oz (2.4 lb)

Produced for:

Arysta LifeScience North America Corporation
15401 Weston Parkway, Suite 150
Cary, NC 27513



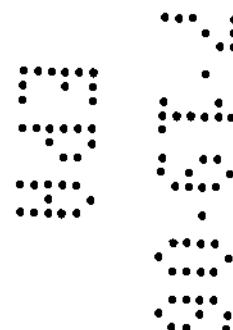
FIRST AID	
If on skin or clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
If swallowed	<ul style="list-style-type: none"> • Call poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE: CALL 1-800-228-5635 Ext. 174	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if absorbed through the skin, swallowed or inhaled. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust or spray mist. Wash thoroughly with soap and water after handling. Remove and wash contaminated clothing before reuse.



PERSONAL PROTECTIVE EQUIPMENT (PPE)

All mixers, loaders, applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Socks
- Shoes
- Chemical-Resistant gloves made of any waterproof material

User safety requirement

Follow the manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables are available, use detergent and hot water. Keep and wash PPE separately from other laundry.

User safety Recommendations

- Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This pesticide is moderately toxic to aquatic invertebrates and fish. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate. Do not allow runoff into lakes, streams, ponds or public waterways. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas.

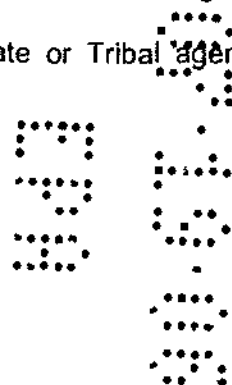
Granules exposed on soil surface may be hazardous to fish and aquatic invertebrates. Collect granules spilled during loading.

Observe the most restrictive of the labeling limitations and precautions of all products used in mixtures.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

For any requirements specific to your State or Tribe, consult the State or Tribal agency responsible for pesticide regulation.



AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions on this label about personal protective equipment (PPE), notification to workers, and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow entry into treated areas during the restricted entry interval (REI) of 4 hours unless wearing appropriate PPE.

PPE required for early entry into treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water is: coveralls, socks, shoes, chemical resistant gloves made of waterproof material.

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in the box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries or greenhouses. Keep children and pets out of treated area until sprays have dried.

GENERAL INFORMATION

ENDORSE Water Dispersible Granules is for use in controlling or suppressing certain diseases on ornamentals, golf courses, residential lawns, parks, and commercial and institutional grounds composed of cool and warm season grasses such as Bluegrass, Bentgrass, Fescue, Ryegrass, Zoysiagrass, or their mixtures.

Apply ENDORSE Water Dispersible Granules as a preventive or curative treatment in conjunction with good turf and ornamental management practices.

RESISTANCE MANAGEMENT RECOMMENDATIONS

ENDORSE Water Dispersible Granules contains a Group 19 fungicide. Fungal isolates with acquired resistance to Group 19 may eventually dominate the fungal population if Group 19 fungicides are used repeatedly in the same field or in successive years as the primary method of control for targeted species. This may result in partial or total loss of control of those species by ENDORSE Water Dispersible Granules or other Group 19 Fungicides.

To delay fungicide resistance, consider:

- Avoiding the consecutive use of ENDORSE Water Dispersible Granules or other target site of action Group 19 fungicides that have a similar target site of action, on the same pathogens.
- Using tank-mixtures or premixes with fungicides from different target site of action Groups as long as the involved products are all registered for the same use and are both effective at the tank mix or prepack rate on the pathogen(s) of concern.
- Basing fungicide use on a comprehensive IPM program.
- Monitoring treated fungal populations for loss of field efficacy.
- Contacting your local extension specialist, certified crop advisors, and/or manufacturer for fungicide resistance management and/or IPM recommendations for specific crops and resistant pathogens.

MIXING AND APPLICATION

When diseases not specified on this label are present or expected, it is appropriate to mix ENDORSE Water Dispersible Granules with appropriately labeled fungicides. When tank mixing ENDORSE Water Dispersible Granules with other products, observe all precautions and limitations on each separate product label. It is always advisable to conduct a tank mix compatibility test when you plan to mix this product with other products. To determine the physical compatibility of this product with other products, use a jar test. Using a quart jar, add the proportionate amounts of the products to approximately one quart of water with agitation. Add dry formulations first, then flowables, then emulsifiable concentrates last. After thorough mixing, allow this mixture to stand for 5 minutes. If the combination remains mixed or can be readily remixed, it is physically compatible. Once compatibility has been proven, use the same procedure for adding required ingredients to the spray tank. To assess the potential for phytotoxicity, test tank mixtures on a small number of plants prior to more widespread application.

Do not apply this product through any type of irrigation system.

Mixing instructions for ENDORSE Water Dispersible Granules:

- Fill spray tank with water to $\frac{1}{2}$ of the intended final volume.
- Start spray tank agitation.
- Add the appropriate amount of product to the tank according to the rates in the following tables. Follow the directions above for mixing other products in the spray tank.
- Agitate to ensure thorough mixing while adding the remaining required water.
- DO NOT allow the spray mixture to stand without agitation.

Mix only the amount of spray solution needed to treat the desired area.

For optimum control of labeled diseases, apply ENDORSE Water Dispersible Granules with sufficient water to provide a thorough coverage.

With the exception for treatment of Fairy Ring, irrigation or rainfall soon after treatment with ENDORSE Water Dispersible Granules will decrease disease control. For best control, do not irrigate for 12 hours after treatment.

TURF GRASSES		
Disease	Rate	Application Notes
*Brown Patch *Large Patch (ALL STATES)	2.4 lbs /acre (0.27 lb ai/acre in a minimum of 88 gallons of water)	<ul style="list-style-type: none"> • Repeat treatment on a 7-14 day schedule where environmental conditions are conducive to development of diseases.¹ • When symptoms are present, best control will be achieved by using a shorter interval. • For best results apply after mowing.
**Cool Weather Brown Patch (Yellow Patch) (<i>Rhizoctonia cerealis</i>) **Foliar and Basal Anthracnose (<i>Collectotrichum graminicola</i>) **Gray Snow Mold (<i>Typhula ishikariensis</i> and <i>Typhula incarnate</i>) **Leaf Spot/Melting Out (<i>Dreschlera poae</i>) **Pink Snow Mold (<i>Microdochium solani</i>) **Red Thread (<i>Laetisaria fuciformis</i>) **Rhizoctonia Damping Off (<i>Rhizoctonia solani</i>) **Zoysia Patch (<i>Rhizoctonia solani</i>) (EXCEPT CALIFORNIA.)		
***Gray Leaf Spot (<i>Pyricularia grisea</i>). EXCEPT CALIFORNIA.		
****Fairy Ring (including <i>Marasmius</i> spp., <i>Lepiota</i> , spp. and <i>Agarius</i> spp.) (ALL STATES)	1 oz/1000 square feet in minimum of 2 gallons of water (0.27 lb ai/acre in 88 gallons of water)	<ul style="list-style-type: none"> • Make two-three applications on a 7-day interval schedule. • Use a penetrating wetting agent. • Immediately following application, water in the treatment with sufficient irrigation (0.5-1") to wet the active root zone.
Notes: <ul style="list-style-type: none"> • Control • ** Aids in control • *** Aids in suppression • ****Suppression and short term control • ¹Consult your local extension agent or local recommendations for information relating to proper timing for control of these diseases. • Use in alternation with fungicides that have different modes of action. 		

ORNAMENTALS		
Foliar Diseases	Rate	Application Notes
*Botrytis blight (<i>Botrytis cinerea</i>)	0.25 – 0.5 lb/100 gal/acre 0.03 – 0.06 lb ai/100 gal/acre	<ul style="list-style-type: none"> • Apply as a foliar spray every 7 – 10 days. • Apply prior to disease development and when conditions are conducive to disease development.¹
*Alternaria blight (<i>Alternaria panax</i>)	0.5 lb/100 gal 0.06 lb ai/100 gal/acre	
Root and Crown Diseases	Rate	Application Notes
*Rhizoctonia root and crown rot (<i>Rhizoctonia solani</i>)	0.25 – 0.5 lb/100 gal/acre 0.03 – 0.06 lb ai/100 gal/acre	<ul style="list-style-type: none"> • Apply as a soil drench every 14 – 28 days.
Notes: <ul style="list-style-type: none"> • * Control • ¹Consult your local extension agent or local recommendations for information relating to proper timing for control of these diseases. • Use in alternation with fungicides that have different modes of action. 		

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store in dry place away from food or feed.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed, by State and local authorities, by burning. If burned, stay out of smoke.

**FOR 24-HOUR CHEMICAL EMERGENCY
(Spill, Leak, Fire or Accident) ASSISTANCE:
CALL CHEMTREC 1-800-424-9300**

CONDITIONS OF SALE

1. Arysta LifeScience North America Corporation warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in accordance with the Directions for Use under normal conditions of use.
2. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Arysta LifeScience North America. **ARYSTA LIFESCIENCE NORTH AMERICA DISCLAIMS ALL OTHER WARRANTIES, EXPRESSED OR IMPLIED, INCLUDING ANY WARRANTY OF FITNESS OR MERCHANTABILITY. TO THE EXTENT PERMITTED BY LAW, SELLER SHALL NOT BE LIABLE FOR CONSEQUENTIAL SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. TO THE EXTENT PERMITTED BY LAW, SELLER'S LIABILITY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE. ARYSTA LIFESCIENCE NORTH AMERICA DOES NOT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTY, GUARANTEE OR REPRESENTATION CONCERNING THIS PRODUCT.**
3. Critical and unforeseeable factors beyond Arysta LifeScience North America's control prevent Arysta LifeScience North America from eliminating all risks in connection with the use of this product. Such risks include, but are not limited to, damage to plants and crops to which the product is applied, lack of complete control, and damage caused by drift to other plants or crops. Such risks occur even though the product is reasonably fit for the use stated on the label and even though label directions are followed. Except as stated in 1 above, to the extent permitted by law, Buyer and User acknowledge and assume all risks and liabilities resulting from handling, storage, and use of this product.

ENDORSE® is a registered trademark of Arysta LifeScience North America Corporation.

Carol Frazer/DC/USEPA/US
07/11/2006 10:38 AM

To "Bujor, Doina" <doina.bujor@arystalifescience.com>
cc
bcc
Subject EPA Reg. No. 68173-3 and 66330-56 Label Amendments
Dated December 19, 2005

Doina,

When I looked at the material you sent back after my request to you, I immediately sent it forward for signature, but my supervisor found some things I had overlooked. If you can fix these up as quickly as you did the last, I hope we can finally get this signed and approved this week. If you think it will not be answered so quickly and may need another submission, please give me a call and we can discuss this.

1. The new size of the retail container of pesticide you market is 1 pound, but the label says to use 2.4 pounds per acre. Chapter 17, IV.C "CONSISTENCY WITH DIRECTIONS FOR USE," states that "The Directions for Use on the label must not require a quantity of pesticide product that exceeds the Net Contents/Net Weight of the package." You will need to change either the size of the sales package, or alter the amount in the Directions for Use on label page 6 which gives the amount to use as 2.4 lb/acre. I understand you used to sell the product in a bag of 2.4 lbs, and if you wish to return to that, you will need to submit another 8570-1 form. The alternative, to change the amounts to be used in the Directions for Use is a little more problematic, as that would require you to say to use a package for "a third of an acre," or "x" square feet, however the math works.
2. On page 4 of the label, the Non-Agricultural Use Requirements box is placed at the top of the page, with the Agricultural Use Requirements box directly below. Page 20 of Chapter 10, section g. (3), of the Label Review Manual states "This box may be placed anywhere in the Directions for Use section of the label after the Agricultural Use Requirements box."
3. The last problem requires insertion of language as described on page 17 of Chapter 10, and deals with 1. **General Statements**, section b. "For any requirements specific to your State or Tribe, consult the State or Tribal agency responsible for pesticide regulation." This language must appear on all WPS labels near the beginning of the Directions for Use section of the labeling under the heading Agricultural Use Requirements.

Carol E. Frazer, Ph.D., Toxicologist
Regulatory Action Leader
Biochemical Pesticide Branch
Biopesticides and Pollution Prevention Division (7511C)
(703) 308-8810 (phone)
(703) 308-7026 (fax)

Carol Frazer/DC/USEPA/US
06/29/2006 01:44 PM

To "Bujor, Doina" <doina.bujor@arystalifescience.com>
cc Todd Peterson/DC/USEPA/US@EPA, Denise
Greenway/DC/USEPA/US@EPA
bcc
Subject RE: EPA Reg. No. 68173-3 and 66330-56 Label
Amendments Dated December 19,2005

Ms. Bujor,

There are only some minor modifications to be made on a couple of pages. Question 7 in the original letter dated March 30, 2006 discussed some problems with the use of the term "Control" and "Aids in control." In the new labels, there is still a possibility of misunderstanding. If you change the verbiage under GENERAL INFORMATION on page 6, "for use to control or suppress certain diseases," by changing the 'to' to in, and adding "ing" to control and suppress, it reduces the absolute to a more generic term -- "for use in to controlling or suppressing certain diseases."

The only other comment is from Question 11, where the last sentence of that statement referred to the use of the term "primer" which is not an acknowledged term by BPPD. If you leave out that word on page 8 and simply state "Use a penetrating wetting agent," that would be acceptable.

There are also a couple of typographical errors on page 8. The asterisk in front of "Brown Patch and "Large Patch is not found in the Notes on that page, although it is explained on the subsequent page. Also, in the first Rate description there are two ending parentheses, one after ai/acre), and one after water), but only one beginning parenthesis, in front of (0.27.

If you have any questions, please send me an email, or give me a call.

Carol E. Frazer, Ph.D., Toxicologist
Regulatory Action Leader
Biochemical Pesticide Branch
Biopesticides and Pollution Prevention Division (7511C)
(703) 308-8810 (phone)
(703) 308-7026 (fax)
"Bujor, Doina" <doina.bujor@arystalifescience.com>



"Bujor, Doina"
<doina.bujor@arystalifescien
ce.com>
04/06/2006 01:21 PM

To Carol Frazer/DC/USEPA/US@EPA
cc Denise Greenway/DC/USEPA/US@EPA
Subject RE: EPA Reg. No. 68173-3 and 66330-56 Label
Amendments Dated December 19,2005

Dear Ms. Frazer,

Please let me know when we should expect approval of these Labels. Thank you for your help.

Best regards

Doina Bujor

Regulatory Manager - Fungicides
Regulatory Affairs
15401 Weston Parkway, Suite 150
Cary, NC 27513
Tel: 919-678-4879
Fax: 919-678-2196
doina.bujor@arystalifescience.com

Harmony In Growth



Arysta LifeScience

2 / SUBMISSIONS
Included

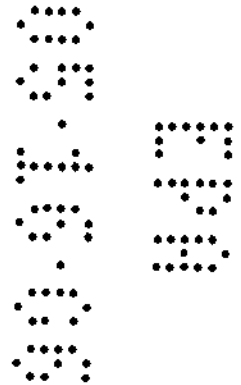
7/29/16

May 10, 2006

8/14/16

Carol Frazer, Ph. D.
Biopesticide and Pollution Prevention Division
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2
Potomac Yard
2777 S Crystal Drive
Arlington, VA 22202
(703)308-8810

RE: **ENDORSE WDG**
(EPA Reg. No. 68173-3 and EPA Reg. No. 66330-56)



Dear Dr. Frazer:

The present submission is in response to the EPA letter dated March 30, 2006. We made the requested corrections to the labels of Endorse WDG (EPA Reg. No. 68173-3 and 66330-56).

Regarding the REI we believe that this product qualifies for a REI of 4 hours conform to PR Notice 95-3. Endorse WDG is a toxicity category III or IV on all acute toxicity testings (dermal, inhalation, skin irritation, primary eye irritation and oral); Endorse WDG is not a skin sensitizer and there are no known reports of hypersensitivity; the active ingredient Polyoxin is not a cholinesterase inhibitor; there are no known reproductive, developmental, carcinogenic or neurotoxic effects associated with the active ingredient; and we believe that there are not illness or injury reports.

We included also a request for a new alternate brand name for Endorse WDG, EPA Reg. no. 66330-56. The proposed new name is Veranda WDG.

Regarding Endorse WP (EPA Reg. No. 68173-2 and 66330-41) we will follow your recommendations to update the labels and we will make the submission shortly.

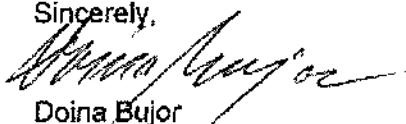
The present submission contains:

1. Cover letter
2. Application for pesticide (EPA form 8570-1)
3. One copy of the red-line label for 68173-3
4. One copy of the red-line label for 66330-56

5. Five copies of the clean label for 68173-3
6. Five copies of the clean label for 66330-56

Please notify Arysta when these labels are approved. If you have any questions please contact me at (919)678-4879 or by e-mail at doina.bujor@arystalifescience.com

Sincerely,



Doina Bujor
Project Manager – Polyoxin
Registrations and Regulatory Affairs
Arvesta Corporation

Alternate Brand Name for ENDORSE Water Dispersible Granules:

- VERANDA™ Water Dispersible Granules

ENDORSE® Water Dispersible Granules

For use on Turf and Ornamentals

GROUP	19	FUNGICIDE
-------	----	-----------

ACTIVE INGREDIENT:

Polyoxin D zinc salt 11.3%

OTHER INGREDIENTS: 88.7%

TOTAL..... 100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE SIDE/BACK PANEL FOR FIRST AID AND ADDITIONAL PRECAUTIONARY
STATEMENTS.

For Product Information Call 1-866-761-9397

EPA Reg. No. 66330-56 _____

EPA Est. No. _____

Net Content: 1 lb.

Produced for:

Arysta LifeScience North America Corporation

15401 Weston Parkway, Suite 150

Cary, NC 27513

FIRST AID	
If on skin or clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. ▪ Call a poison control center or doctor for treatment advice.
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
If swallowed	<ul style="list-style-type: none"> • Call poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE: CALL 1-800-228-5635 Ext. 174	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if absorbed through the skin, swallowed or inhaled. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust or spray mist. Wash thoroughly with soap and water after handling. Remove and wash contaminated clothing before reuse.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

All mixers, loaders, applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Socks
- Shoes
- Chemical-Resistant gloves made of any waterproof material

User safety requirement

Follow the manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables are available, use detergent and hot water. Keep and wash PPE separately from other laundry.

User safety Recommendations

- Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This pesticide is moderately toxic to aquatic invertebrates and fish. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate. Do not allow runoff into lakes, streams, ponds or public waterways. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas.

Granules exposed on soil surface may be hazardous to fish and aquatic invertebrates. Collect granules spilled during loading.

Observe the most restrictive of the labeling limitations and precautions of all products used in mixtures.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in the box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries or greenhouses. Keep children and pets out of treated area until sprays have dried.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions on this label about personal protective equipment (PPE), notification to workers, and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow entry into treated areas during the restricted entry interval (REI) of 4 hours unless wearing appropriate PPE.

PPE required for early entry into treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water is: coveralls, socks, shoes, chemical resistant gloves made of waterproof material.

GENERAL INFORMATION

ENDORSE Water Dispersible Granules is for use in controlling or suppressing certain diseases on ornamentals, golf courses, residential lawns, parks, and commercial and institutional grounds composed of cool and warm season grasses such as Bluegrass, Bentgrass, Fescue, Ryegrass, Zoysiagrass, or their mixtures.

Apply ENDORSE Water Dispersible Granules as a preventive or curative treatment in conjunction with good turf and ornamental management practices.

RESISTANCE MANAGEMENT RECOMMENDATIONS

ENDORSE Water Dispersible Granules contains a Group 19 fungicide. Fungal isolates with acquired resistance to Group 19 may eventually dominate the fungal population if Group 19 fungicides are used repeatedly in the same field or in successive years as the primary method of control for targeted species. This may result in partial or total loss of control of those species by ENDORSE Water Dispersible Granules or other Group 19 Fungicides.

To delay fungicide resistance, consider:

- Avoiding the consecutive use of ENDORSE Water Dispersible Granules or other target site of action Group 19 fungicides that have a similar target site of action,

on the same pathogens.

- Using tank-mixtures or premixes with fungicides from different target site of action Groups as long as the involved products are all registered for the same use and are both effective at the tank mix or prepack rate on the pathogen(s) of concern.
- Basing fungicide use on a comprehensive IPM program.
- Monitoring treated fungal populations for loss of field efficacy.
- Contacting your local extension specialist, certified crop advisors, and/or manufacturer for fungicide resistance management and/or IPM recommendations for specific crops and resistant pathogens.

MIXING AND APPLICATION

When diseases not specified on this label are present or expected, it is appropriate to mix ENDORSE Water Dispersible Granules with appropriately labeled fungicides. When tank mixing ENDORSE Water Dispersible Granules with other products, observe all precautions and limitations on each separate product label. It is always advisable to conduct a tank mix compatibility test when you plan to mix this product with other products. To determine the physical compatibility of this product with other products, use a jar test. Using a quart jar, add the proportionate amounts of the products to approximately one quart of water with agitation. Add dry formulations first, then flowables, then emulsifiable concentrates last. After thorough mixing, allow this mixture to stand for 5 minutes. If the combination remains mixed or can be readily remixed, it is physically compatible. Once compatibility has been proven, use the same procedure for adding required ingredients to the spray tank. To assess the potential for phytotoxicity, test tank mixtures on a small number of plants prior to more widespread application.

Do not apply this product through any type of irrigation system.

Mixing instructions for ENDORSE Water Dispersible Granules:

- Fill spray tank with water to ½ of the intended final volume.
- Start spray tank agitation.
- Add the appropriate amount of product to the tank according to the rates in the following tables. Follow the directions above for mixing other products in the spray tank.
- Agitate to ensure thorough mixing while adding the remaining required water.
- DO NOT allow the spray mixture to stand without agitation.

Mix only the amount of spray solution needed to treat the desired area.

For optimum control of labeled diseases, apply ENDORSE Water Dispersible Granules with sufficient water to provide a thorough coverage.

With the exception for treatment of Fairy Ring, irrigation or rainfall soon after treatment with ENDORSE Water Dispersible Granules will decrease disease control. For best control, do not irrigate for 12 hours after treatment.

TURF GRASSES		
Disease	Rate	Application Notes
*Brown Patch *Large Patch (ALL STATES)	2.4 lbs /acre (0.27 lb ai/acre in a minimum of 88 gallons of water)	<ul style="list-style-type: none"> Repeat treatment on a 7-14 day schedule where environmental conditions are conducive to development of diseases.¹ When symptoms are present, best control will be achieved by using a shorter interval. For best results apply after mowing.
**Cool Weather Brown Patch (Yellow Patch) (<i>Rhizoctonia cerealis</i>) **Foliar and Basal Anthracnose (<i>Collectotrichum graminicola</i>) **Gray Snow Mold (<i>Typhula ishikariensis</i> and <i>Typhula incarnate</i>) **Leaf Spot/Melting Out (<i>Dreischlera poae</i>) **Pink Snow Mold (<i>Microdochium solani</i>) **Red Thread (<i>Laetisaria fuciformis</i>) **Rhizoctonia Damping Off (<i>Rhizoctonia solani</i>) **Zoysia Patch (<i>Rhizoctonia solani</i>) (EXCEPT CALIFORNIA.)		
***Gray Leaf Spot (<i>Pyricularia grisea</i>). EXCEPT CALIFORNIA.		
****Fairy Ring (including <i>Marasmius</i> spp., <i>Lepiota</i> spp. and <i>Agarius</i> spp.) (ALL STATES)	1 oz/1000 square feet in minimum of 2 gallons of water (0.27 lb ai/acre in 88 gallons of water)	<ul style="list-style-type: none"> Make two-three applications on a 7-day interval schedule. Use a penetrating wetting agent. Immediately following application, water in the treatment with sufficient irrigation (0.5-1") to wet the active root zone.
Notes: <ul style="list-style-type: none"> * Control ** Aids in control *** Aids in suppression ****Suppression and short term control ¹ Consult your local extension agent or local recommendations for information relating to proper timing for control of these diseases. Use in alternation with fungicides that have different modes of action. 		

ORNAMENTALS		
Foliar Diseases	Rate	Application Notes
*Botrytis blight (<i>Botrytis cinerea</i>)	0.25 – 0.5 lb/100 gal/acre 0.03 – 0.06 lb ai/100 gal/acre	<ul style="list-style-type: none"> • Apply as a foliar spray every 7 – 10 days. • Apply prior to disease development and when conditions are conducive to disease development.¹
*Alternaria blight (<i>Alternaria panax</i>)	0.5 lb/100 gal 0.06 lb ai/100 gal/acre	
Root and Crown Diseases	Rate	Application Notes
*Rhizoctonia root and crown rot (<i>Rhizoctonia solani</i>)	0.25 – 0.5 lb/100 gal/acre 0.03 – 0.06 lb ai/100 gal/acre	<ul style="list-style-type: none"> • Apply as a soil drench every 14 – 28 days.
Notes: <ul style="list-style-type: none"> • * Control • ¹Consult your local extension agent or local recommendations for information relating to proper timing for control of these diseases. • Use in alternation with fungicides that have different modes of action. 		

STORAGE AND DISPOSAL
Do not contaminate water, food or feed by storage or disposal. PESTICIDE STORAGE: Store in dry place away from food or feed. PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. CONTAINER DISPOSAL: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed, by State and local authorities, by burning. If burned, stay out of smoke.

FOR 24-HOUR CHEMICAL EMERGENCY (Spill, Leak, Fire or Accident) ASSISTANCE: CALL CHEMTREC 1-800-424-9300
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CONDITIONS OF SALE

1. Arysta LifeScience North America Corporation warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in accordance with the Directions for Use under normal conditions of use.
2. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Arysta LifeScience North America. **ARYSTA LIFESCIENCE NORTH AMERICA DISCLAIMS ALL OTHER WARRANTIES, EXPRESSED OR IMPLIED, INCLUDING ANY WARRANTY OF FITNESS OR MERCHANTABILITY. TO THE EXTENT PERMITTED BY LAW, SELLER SHALL NOT BE LIABLE FOR CONSEQUENTIAL SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. TO THE EXTENT PERMITTED BY LAW, SELLER'S LIABILITY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE. ARYSTA LIFESCIENCE NORTH AMERICA DOES NOT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTY, GUARANTEE OR REPRESENTATION CONCERNING THIS PRODUCT.**
3. Critical and unforeseeable factors beyond Arysta LifeScience North America's control prevent Arysta LifeScience North America from eliminating all risks in connection with the use of this product. Such risks include, but are not limited to, damage to plants and crops to which the product is applied, lack of complete control, and damage caused by drift to other plants or crops. Such risks occur even though the product is reasonably fit for the use stated on the label and even though label directions are followed. Except as stated in 1 above, to the extent permitted by law, Buyer and User acknowledge and assume all risks and liabilities resulting from handling, storage, and use of this product.

ENDORSE® is a registered trademark of Arysta LifeScience North America Corporation.

Yellow - Applicant Copy

06greenway

66330-56

ENDORSE Water Dispersible Granules - MB102505
Page 1 of 5

ENDORSE® Water Dispersible Granules

GROUP	19	FUNGICIDE
-------	----	-----------

ACTIVE INGREDIENT:

Polyoxin D zinc salt 11.3%

OTHER INGREDIENTS: 88.7%

TOTAL..... 100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

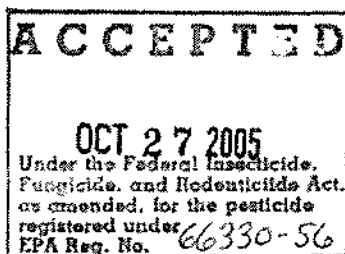
SEE SIDE/BACK PANEL FOR FIRST AID AND ADDITIONAL PRECAUTIONARY
STATEMENTS.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Causes moderate eye irritation. Harmful if absorbed through the skin, swallowed or inhaled. Avoid contact with skin, eyes or clothing. Avoid breathing dust or spray mist. Wash thoroughly with soap and water after handling. Remove and wash contaminated clothing before reuse.



FIRST AID	
If on skin or clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
If swallowed	<ul style="list-style-type: none"> • Call poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
<p align="center">FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE: CALL 1-800-228-5635 Ext. 174</p>	

ENVIRONMENTAL HAZARDS

This pesticide is moderately toxic to aquatic invertebrates and fish. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate. Do not allow runoff into lakes, streams, ponds or public waterways. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas.

Granules exposed on soil surface may be hazardous to fish and aquatic invertebrates. Collect granules spilled during loading.

Observe the most restrictive of the labeling limitations and precautions of all products used in mixtures.

EPA Reg. No. 66330-LA

EPA EST. No. _____

Net weight 2 pounds, 6.4 ounces (2.4 lbs)

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

GENERAL INFORMATION

ENDORSE Water Dispersible Granules is NOT for use on turf being grown (1) for sale or other commercial use as sod, (2) for commercial seed production, or (3) for research purposes.

ENDORSE Water Dispersible Granules is for use on golf courses, residential lawns, parks, and commercial and institutional grounds composed of cool and warm season grasses such as Bluegrass, Bentgrass, Fescue, Ryegrass, Zoysiagrass, or their mixtures.

ENDORSE Water Dispersible Granules is a systemic, foliar applied turf fungicide for control of **Brown Patch** and **Large Patch** caused by *Rhizoctonia* spp. ENDORSE Water Dispersible Granules also controls **Cool Weather Brown Patch (Yellow Patch)** (*Rhizoctonia cerealis*), **Foliar and Basal Anthracnose** (*Colletotrichum graminicola*), **Gray Snow Mold** (*Typhula ishikariensis* and *Typhula incarnata*), **Leaf Spot/Melting Out** (*Dreschlera poae*), **Pink Snow Mold** (*Microdochium nivale*), **Red Thread** (*Laetisaria fuciformis*), **Rhizoctonia Damping Off** (*Rhizoctonia solani*), and **Zoysia Patch** (*Rhizoctonia solani*) on cool and warm season turf grasses.

ENDORSE Water Dispersible Granules also aids in the suppression of **Gray Leaf Spot** (*Pyricularia grisea*).

Apply ENDORSE Water Dispersible Granules as a preventive or curative treatment in conjunction with good turf management practices.

RESISTANCE MANAGEMENT RECOMMENDATIONS

ENDORSE Water Dispersible Granules contains a Group 19 fungicide. Fungal isolates with acquired resistance to Group 19 may eventually dominate the fungal population if Group 19 fungicides are used repeatedly in the same field or in successive years as the primary method of control for targeted species. This may result in partial or total loss of control of those species by ENDORSE Water Dispersible Granules or other Group 19 Fungicides.

To delay fungicide resistance, consider:

- Avoiding the consecutive use of ENDORSE Water Dispersible Granules or other target site of action Group 19 fungicides that have a similar target site of action, on the same pathogens.

- Using tank-mixtures or premixes with fungicides from different target site of action Groups as long as the involved products are all registered for the same use and are both effective at the tank mix or prepack rate on the pathogen(s) of concern.
- Basing fungicide use on a comprehensive IPM program.
- Monitoring treated fungal populations for loss of field efficacy.
- Contacting your local extension specialist, certified crop advisors, and/or manufacturer for fungicide resistance management and/or IPM recommendations for specific crops and resistant pathogens.

MIXING AND APPLICATION

When diseases not specified on this label, such as Dollar Spot, are present or expected, it is appropriate to mix ENDORSE Water Dispersible Granules with appropriately labeled fungicides. When tank mixing ENDORSE Water Dispersible Granules with other products, observe all precautions and limitations on each separate product label. It is always advisable to conduct a tank mix compatibility test when you plan to mix this product with other products. To determine the physical compatibility of this product with other products, use a jar test. Using a quart jar, add the proportionate amounts of the products to approximately one quart of water with agitation. Add dry formulations first, then flowables, then emulsifiable concentrates last. After thorough mixing, allow this mixture to stand for 5 minutes. If the combination remains mixed or can be readily remixed, it is physically compatible. Once compatibility has been proven, use the same procedure for adding required ingredients to the spray tank. To assess the potential for phytotoxicity, test tank mixtures on a small number of plants prior to more widespread application.

Do not apply this product through any type of irrigation system.

Mixing instructions for ENDORSE Water Dispersible Granules:

- Fill spray tank with water to ½ of the intended final volume.
- Start spray tank agitation.
- Add the appropriate amount of product to the tank (refer to Rate and Schedule section of label). Follow the directions above for mixing other products in the spray tank.
- Agitate to ensure thorough mixing while adding the remaining required water.
- DO NOT allow the spray mixture to stand without agitation.

Mix only the amount of spray solution needed to treat the desired area.

For optimum control of labeled diseases, apply ENDORSE Water Dispersible Granules with sufficient water to provide a thorough coverage.

Irrigation or rainfall soon after treatment with ENDORSE Water Dispersible Granules will decrease disease control. For best control, do not irrigate for 12 hours after treatment.

For best results, apply after mowing.

RATE AND SCHEDULE

Apply 2.4 lbs (1 bag) of ENDORSE Water Dispersible Granules per acre (0.27 lbs active ingredient/acre) in a minimum of 88 gallons of water per acre.

Repeat treatment on a 7-14 day schedule as necessary when environmental conditions are conducive to development of disease. When disease symptoms are present, best control will be achieved by using a shorter interval.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store in dry place away from food or feed.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed, by State and local authorities, by burning. If burned, stay out of smoke.

**FOR 24-HOUR CHEMICAL EMERGENCY
(Spill, Leak, Fire or Accident) ASSISTANCE:
CALL CHEMTREC 1-800-424-9300**

CONDITIONS OF SALE

1. Arysta LifeScience North America Corporation warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in accordance with the Directions for Use under normal conditions of use.
2. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Arysta LifeScience North America. ARYSTA LIFESCIENCE NORTH AMERICA DISCLAIMS ALL OTHER WARRANTIES, EXPRESSED OR IMPLIED, INCLUDING ANY WARRANTY OF FITNESS OR MERCHANTABILITY. TO THE EXTENT PERMITTED BY LAW, SELLER SHALL NOT BE LIABLE FOR CONSEQUENTIAL SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. TO THE EXTENT PERMITTED BY LAW, SELLER'S LIABILITY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE. ARYSTA LIFESCIENCE NORTH AMERICA DOES NOT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTY, GUARANTEE OR REPRESENTATION CONCERNING THIS PRODUCT.
3. Critical and unforeseeable factors beyond Arysta LifeScience North America's control prevent Arysta LifeScience North America from eliminating all risks in connection with the use of this product. Such risks include, but are not limited to, damage to plants and crops to which the product is applied, lack of complete control,

and damage caused by drift to other plants or crops. Such risks occur even though the product is reasonably fit for the use stated on the label and even though label directions are followed. Except as stated in 1 above, to the extent permitted by law, Buyer and User acknowledge and assume all risks and liabilities resulting from handling, storage, and use of this product.

ENDORSE® is a registered trademark of Arysta LifeScience North America Corporation.

Produced for:
Arysta LifeScience North America Corporation
100 First Street, Suite 1700
San Francisco, CA 94105

Alternate Brand Name for ENDORSE Water Dispersible Granules:

- VERANDA™ Water Dispersible Granules

ENDORSE® Water Dispersible Granules

For use on Turf and Ornamentals

GROUP 19 FUNGICIDE

ACTIVE INGREDIENT:

Polyoxin D zinc salt 11.3%

OTHER INGREDIENTS: 88.7%

TOTAL..... 100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE SIDE/BACK PANEL FOR FIRST AID AND ADDITIONAL PRECAUTIONARY STATEMENTS.

For Product Information Call 1-866-761-9397

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

~~Causes moderate eye irritation. Harmful if absorbed through the skin, swallowed or inhaled. Avoid contact with skin, eyes or clothing. Avoid breathing dust or spray mist. Wash thoroughly with soap and water after handling. Remove and wash contaminated clothing before reuse.~~

EPA Reg. No. 66330-56

EPA Est. No.

Net Content: 1 lb.

Produced for:

Arysta LifeScience North America Corporation

15401 Weston Parkway, Suite 150

Cary, NC 27513

FIRST AID	
If on skin or clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
If swallowed	<ul style="list-style-type: none"> • Call poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE: CALL 1-800-228-5635 Ext. 174	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if absorbed through the skin, swallowed or inhaled. Causes moderate eye irritation. Harmful if absorbed through the skin, swallowed or inhaled. Avoid contact with skin, eyes or clothing. Avoid breathing dust or spray mist. Wash thoroughly with soap and water after handling. Remove and wash contaminated clothing before reuse.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

All mixers, loaders, applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Socks
- Shoes
- Chemical-Resistant gloves made of any waterproof material

User safety requirement

Follow the manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables are available, use detergent and hot water. Keep and wash PPE separately from other laundry.

User safety Recommendations

- Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This pesticide is moderately toxic to aquatic invertebrates and fish. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate. Do not allow runoff into lakes, streams, ponds or public waterways. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas.

Granules exposed on soil surface may be hazardous to fish and aquatic invertebrates. Collect granules spilled during loading.

Observe the most restrictive of the labeling limitations and precautions of all products used in mixtures.

EPA Reg. No. 68173

EPA EST. No.

Net weight 2 pounds, 6.4 ounces (2.4 lbs)

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in the box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries or greenhouses. Keep children and pets out of treated area until sprays have dried.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions on this label about personal protective equipment (PPE), notification to workers, and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow entry into treated areas during the restricted entry interval (REI) of 4 hours unless wearing appropriate PPE.

PPE required for early entry into treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water is: coveralls, socks, shoes, chemical resistant gloves made of waterproof material.

GENERAL INFORMATION

~~ENDORSE Water Dispersible Granules is NOT for use on turf being grown (1) for sale or other commercial use as sod, (2) for commercial seed production, or (3) for research purposes.~~

ENDORSE Water Dispersible Granules is for use to control or suppress certain diseases on ornamentals, golf courses, residential lawns, parks, and commercial and institutional grounds composed of cool and warm season grasses such as Bluegrass, Bentgrass, Fescue, Ryegrass, Zoysiagrass, or their mixtures.

~~ENDORSE Water Dispersible Granules is a systemic, foliar applied turf fungicide for control of **Brown Patch** and **Large Patch** caused by *Rhizoctonia* spp. and for the suppression and short term control of **Fairy Ring** caused by the various *Basidiomycetes* fungal pathogens including *Marasmius* spp., *Lepiota* spp. and *Agarius* spp. (ALL STATES)~~

~~ENDORSE Water Dispersible Granules also controls **Cool Weather Brown Patch (Yellow Patch)** (*Rhizoctonia cerealis*), **Foliar and Basal Anthracnose** (*Colletotrichum graminicola*), **Gray Snow Mold** (*Typhula ishikariensis* and *Typhula incarnata*), **Leaf Spot/Melting Out** (*Drechslera poae*), **Pink Snow Mold** (*Microdochium nivale*), **Red**~~

~~Thread (*Laetisaria fuciformis*), Rhizoctonia Damping Off (*Rhizoctonia solani*), and Zoysia Patch (*Rhizoctonia solani*) on cool and warm season turf grasses. (EXCEPT CALIFORNIA)~~

ENDORSE Water Dispersible Granules also aids in the suppression of ~~Gray Leaf Spot (*Pyricularia grisea*)~~. (EXCEPT CALIFORNIA)

Apply ENDORSE Water Dispersible Granules as a preventive or curative treatment in conjunction with good turf and ornamental management practices.

~~ENDORSE Water Dispersible Granules also controls Botrytis blight (*Botrytis cinerea*), Alternaria blight (*Alternaria* spp.) and Rhizoctonia root and crown rot (*Rhizoctonia solani*) on Ornamentals.~~

RESISTANCE MANAGEMENT RECOMMENDATIONS

ENDORSE Water Dispersible Granules contains a Group 19 fungicide. Fungal isolates with acquired resistance to Group 19 may eventually dominate the fungal population if Group 19 fungicides are used repeatedly in the same field or in successive years as the primary method of control for targeted species. This may result in partial or total loss of control of those species by ENDORSE Water Dispersible Granules or other Group 19 Fungicides.

To delay fungicide resistance, consider:

- Avoiding the consecutive use of ENDORSE Water Dispersible Granules or other target site of action Group 19 fungicides that have a similar target site of action, on the same pathogens.
- Using tank-mixtures or premixes with fungicides from different target site of action Groups as long as the involved products are all registered for the same use and are both effective at the tank mix or prepack rate on the pathogen(s) of concern.
- Basing fungicide use on a comprehensive IPM program.
- Monitoring treated fungal populations for loss of field efficacy.
- Contacting your local extension specialist, certified crop advisors, and/or manufacturer for fungicide resistance management and/or IPM recommendations for specific crops and resistant pathogens.

MIXING AND APPLICATION

When diseases not specified on this label, such as ~~Dollar Spot~~, are present or expected, it is appropriate to mix ENDORSE Water Dispersible Granules with appropriately labeled fungicides. When tank mixing ENDORSE Water Dispersible Granules with other products, observe all precautions and limitations on each separate product label. It is always advisable to conduct a tank mix compatibility test when you plan to mix this product with other products. To determine the physical compatibility of this product with other products, use a jar test. Using a quart jar, add the proportionate amounts of the products to approximately one quart of water with agitation. Add dry formulations first, then flowables, then emulsifiable concentrates last. After thorough mixing, allow this

mixture to stand for 5 minutes. If the combination remains mixed or can be readily remixed, it is physically compatible. Once compatibility has been proven, use the same procedure for adding required ingredients to the spray tank. To assess the potential for phytotoxicity, test tank mixtures on a small number of plants prior to more widespread application.

Do not apply this product through any type of irrigation system.

Mixing instructions for ENDORSE Water Dispersible Granules:

- Fill spray tank with water to ½ of the intended final volume.
- Start spray tank agitation.
- Add the appropriate amount of product to the tank (refer to Rate and Schedule section of label) according to the rates in the following tables. Follow the directions above for mixing other products in the spray tank.
- Agitate to ensure thorough mixing while adding the remaining required water.
- DO NOT allow the spray mixture to stand without agitation.

Mix only the amount of spray solution needed to treat the desired area.

For optimum control of labeled diseases, apply ENDORSE Water Dispersible Granules with sufficient water to provide a thorough coverage.

With the exception for treatment of Fairy Ring, irrigation or rainfall soon after treatment with ENDORSE Water Dispersible Granules will decrease disease control. For best control, do not irrigate for 12 hours after treatment.

For best results, apply after mowing.

RATE AND SCHEDULE

Apply 2.4 lbs (1 bag) of ENDORSE Water Dispersible Granules per acre (0.27 lbs active ingredient/acre) in a minimum of 88 gallons of water per acre.

Repeat treatment on a 7-14 day schedule as necessary when environmental conditions are conducive to development of disease. When disease symptoms are present, best control will be achieved by using a shorter interval.

TURF GRASSES		
Disease	Rate	Application Notes
*Brown Patch *Large Patch (ALL STATES)	2.4 lbs (1 bag)/acre (0.27 lb active ingredient ai/acre) in a minimum of 88 gallons of water/acre)	• Repeat treatment on a 7-14 day schedule where environmental conditions are conductive to development of diseases. ¹
**Cool Weather Brown Patch (Yellow Patch) (<i>Rhizoctonia cerealis</i>);		
**Foliar and Basal Anthracnose (<i>Collectotrichum graminicola</i>);		

<p><u>**Gray Snow Mold (<i>Typhula ishikariensis</i> and <i>Typhula incarnate</i>)</u>;</p> <p><u>**Leaf Spot/Melting Out (<i>Dreschlera poae</i>)</u>;</p> <p><u>**Pink Snow Mold (<i>Microdochium solani</i>)</u>; and</p> <p><u>**Red Thread (<i>Laelisaria fuciformis</i>)</u></p> <p><u>**Rhizoctonia Damping Off (<i>Rhizoctonia solani</i>)</u></p> <p><u>**Zoysia Patch (<i>Rhizoctonia solani</i>) on cool and warm season turf grasses</u>;</p> <p><u>(EXCEPT CALIFORNIA.)</u></p>		<ul style="list-style-type: none"> • <u>When symptoms are present, best control will be achieved by using a absorb shorter interval.</u> • <u>For best results apply after mowing.</u>
<p><u>***Gray Leaf Spot (<i>Pyricularia grisea</i>). EXCEPT CALIFORNIA.</u></p>		
<p><u>****Fairy Ring (including <i>Marasmius</i> spp., <i>Lepiota</i> spp. and <i>Agarius</i> spp.)</u></p> <p><u>(ALL STATES)</u></p>	<p><u>1 oz/1000 square feet in minimum of 2 gallons of water (0.275 lb ai/acre)† in 88 gallons of water/acre)</u></p>	<ul style="list-style-type: none"> • <u>Make two-three applications on a 7-day interval schedule.</u> • <u>Use a penetrating wetting agent (such as primer or equivalent).</u> • <u>Immediately following application, water in the treatment with sufficient irrigation (0.5-1") to wet the active root zone.</u>
<p><u>Notes:</u></p> <ul style="list-style-type: none"> • <u>*—Control</u> • <u>** Aids in control</u> • <u>*** Aids in suppression</u> • <u>****Suppression and short term control.</u> • <u>†Consult your local extension agent or local recommendations for information relating to proper timing for control of these diseases.</u> • <u>Use in alternation with fungicides that have different modes of action.</u> 		

ORNAMENTALS		
Foliar Diseases	Rate	Application Notes
* <i>Botrytis blight (Botrytis cinerea)</i>	0.25 – 0.5 lb/100 gal/acre 0.03 – 0.06 lb ai/100 gal/acre	<ul style="list-style-type: none"> • Apply as a foliar spray every 7 – 10 days. • Apply prior to disease development and when conditions are conducive to disease development.¹
* <i>Alternaria blight (Alternaria panax)</i>	0.5 lb/100 gal 0.06 lb ai/100 gal/acre	
Root and Crown Diseases	Rate	Application Notes
* <i>Rhizoctonia root and crown rot (Rhizoctonia solani)</i>	0.25 – 0.5 lb/100 gal/acre 0.03 – 0.06 lb ai/100 gal/acre	<ul style="list-style-type: none"> • Apply as a soil drench every 14 – 28 days.
Notes: <ul style="list-style-type: none"> • * Control • ¹Consult your local extension agent or local recommendations for information relating to proper timing for control of these diseases. • Use in alternation with fungicides that have different modes of action. 		

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store in dry place away from food or feed.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed, by State and local authorities, by burning. If burned, stay out of smoke.

**FOR 24-HOUR CHEMICAL EMERGENCY
(Spill, Leak, Fire or Accident) ASSISTANCE:
CALL CHEMTREC 1-800-424-9300**

CONDITIONS OF SALE

1. Arysta LifeScience North America Corporation warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in accordance with the Directions for Use under normal conditions of use.
2. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Arysta LifeScience North America. **ARYSTA LIFESCIENCE NORTH AMERICA DISCLAIMS ALL OTHER WARRANTIES, EXPRESSED OR IMPLIED, INCLUDING ANY WARRANTY OF FITNESS OR MERCHANTABILITY. TO THE EXTENT PERMITTED BY LAW, SELLER SHALL NOT BE LIABLE FOR CONSEQUENTIAL SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. TO THE EXTENT PERMITTED BY LAW, SELLER'S LIABILITY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE. ARYSTA LIFESCIENCE NORTH AMERICA DOES NOT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTY, GUARANTEE OR REPRESENTATION CONCERNING THIS PRODUCT.**
3. Critical and unforeseeable factors beyond Arysta LifeScience North America's control prevent Arysta LifeScience North America from eliminating all risks in connection with the use of this product. Such risks include, but are not limited to, damage to plants and crops to which the product is applied, lack of complete control, and damage caused by drift to other plants or crops. Such risks occur even though the product is reasonably fit for the use stated on the label and even though label directions are followed. Except as stated in 1 above, to the extent permitted by law, Buyer and User acknowledge and assume all risks and liabilities resulting from handling, storage, and use of this product.

ENDORSE® is a registered trademark of Arysta LifeScience North America Corporation.

Produced for:

Arysta LifeScience North America Corporation _____

400 First Street, Suite 1700 _____

San Francisco, CA

Alternate Brand Name for ENDORSE Water Dispersible Granules:

- VERANDA™ Water Dispersible Granules

ENDORSE® Water Dispersible Granules

For use on Turf and Ornamentals

GROUP	19	FUNGICIDE
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ACTIVE INGREDIENT:

Polyoxin D zinc salt 11.3%

OTHER INGREDIENTS: 88.7%

TOTAL..... 100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE SIDE/BACK PANEL FOR FIRST AID AND ADDITIONAL PRECAUTIONARY
STATEMENTS.

For Product Information Call 1-866-761-9397

EPA Reg. No. 66330-56

EPA Est. No. _____

Net Content: 1 lb.

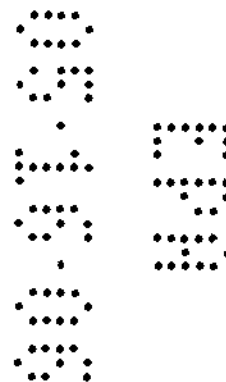
Produced for:

Arysta LifeScience

North America Corporation

15401 Weston Parkway, Suite 150

Cary, NC 27513



FIRST AID	
If on skin or clothing	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15-20 minutes.• Call a poison control center or doctor for treatment advice.
If in eyes	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice.
If swallowed	<ul style="list-style-type: none">• Call poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by the poison control center or doctor.• Do not give anything by mouth to an unconscious person.
If inhaled	<ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.• Call a poison control center or doctor for further treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE: CALL 1-800-228-5635 Ext. 174	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if absorbed through the skin, swallowed or inhaled. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust or spray mist. Wash thoroughly with soap and water after handling. Remove and wash contaminated clothing before reuse.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

All mixers, loaders, applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Socks
- Shoes
- Chemical-Resistant gloves made of any waterproof material

User safety requirement

Follow the manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables are available, use detergent and hot water. Keep and wash PPE separately from other laundry.

User safety Recommendations

- Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This pesticide is moderately toxic to aquatic invertebrates and fish. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate. Do not allow runoff into lakes, streams, ponds or public waterways. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas.

Granules exposed on soil surface may be hazardous to fish and aquatic invertebrates. Collect granules spilled during loading.

Observe the most restrictive of the labeling limitations and precautions of all products used in mixtures.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in the box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries or greenhouses. Keep children and pets out of treated area until sprays have dried.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions on this label about personal protective equipment (PPE), notification to workers, and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow entry into treated areas during the restricted entry interval (REI) of 4 hours unless wearing appropriate PPE.

PPE required for early entry into treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water is: coveralls, socks, shoes, chemical resistant gloves made of waterproof material.

GENERAL INFORMATION

ENDORSE Water Dispersible Granules is for use to control or suppress certain diseases on ornamentals, golf courses, residential lawns, parks, and commercial and institutional grounds composed of cool and warm season grasses such as Bluegrass, Bentgrass, Fescue, Ryegrass, Zoysiagrass, or their mixtures.

Apply ENDORSE Water Dispersible Granules as a preventive or curative treatment in conjunction with good turf and ornamental management practices.

RESISTANCE MANAGEMENT RECOMMENDATIONS

ENDORSE Water Dispersible Granules contains a Group 19 fungicide. Fungal isolates with acquired resistance to Group 19 may eventually dominate the fungal population if Group 19 fungicides are used repeatedly in the same field or in successive years as the primary method of control for targeted species. This may result in partial or total loss of control of those species by ENDORSE Water Dispersible Granules or other Group 19 Fungicides.

To delay fungicide resistance, consider:

- Avoiding the consecutive use of ENDORSE Water Dispersible Granules or other target site of action Group 19 fungicides that have a similar target site of action, on the same pathogens.
- Using tank-mixtures or premixes with fungicides from different target site of

action Groups as long as the involved products are all registered for the same use and are both effective at the tank mix or prepack rate on the pathogen(s) of concern.

- Basing fungicide use on a comprehensive IPM program.
- Monitoring treated fungal populations for loss of field efficacy.
- Contacting your local extension specialist, certified crop advisors, and/or manufacturer for fungicide resistance management and/or IPM recommendations for specific crops and resistant pathogens.

MIXING AND APPLICATION

When diseases not specified on this label are present or expected, it is appropriate to mix ENDORSE Water Dispersible Granules with appropriately labeled fungicides. When tank mixing ENDORSE Water Dispersible Granules with other products, observe all precautions and limitations on each separate product label. It is always advisable to conduct a tank mix compatibility test when you plan to mix this product with other products. To determine the physical compatibility of this product with other products, use a jar test. Using a quart jar, add the proportionate amounts of the products to approximately one quart of water with agitation. Add dry formulations first, then flowables, then emulsifiable concentrates last. After thorough mixing, allow this mixture to stand for 5 minutes. If the combination remains mixed or can be readily remixed, it is physically compatible. Once compatibility has been proven, use the same procedure for adding required ingredients to the spray tank. To assess the potential for phytotoxicity, test tank mixtures on a small number of plants prior to more widespread application.

Do not apply this product through any type of irrigation system.

Mixing instructions for ENDORSE Water Dispersible Granules:

- Fill spray tank with water to $\frac{1}{2}$ of the intended final volume.
- Start spray tank agitation.
- Add the appropriate amount of product to the tank according to the rates in the following tables. Follow the directions above for mixing other products in the spray tank.
- Agitate to ensure thorough mixing while adding the remaining required water.
- DO NOT allow the spray mixture to stand without agitation.

Mix only the amount of spray solution needed to treat the desired area.

For optimum control of labeled diseases, apply ENDORSE Water Dispersible Granules with sufficient water to provide a thorough coverage.

With the exception for treatment of Fairy Ring, irrigation or rainfall soon after treatment with ENDORSE Water Dispersible Granules will decrease disease control. For best control, do not irrigate for 12 hours after treatment.

TURF GRASSES		
Disease	Rate	Application Notes
*Brown Patch *Large Patch (ALL STATES)	2.4 lbs /acre (0.27 lb ai/acre) in a minimum of 88 gallons of water)	<ul style="list-style-type: none"> • Repeat treatment on a 7-14 day schedule where environmental conditions are conducive to development of diseases.¹ • When symptoms are present, best control will be achieved by using a shorter interval. • For best results apply after mowing.
**Cool Weather Brown Patch (Yellow Patch) (<i>Rhizoctonia cerealis</i>) **Foliar and Basal Anthracnose (<i>Collectotrichum graminicola</i>) **Gray Snow Mold (<i>Typhula ishikariensis</i> and <i>Typhula incarnate</i>) **Leaf Spot/Melting Out (<i>Dreschlera poae</i>) **Pink Snow Mold (<i>Microdochium solani</i>) **Red Thread (<i>Laetisaria fuciformis</i>) **Rhizoctonia Damping Off (<i>Rhizoctonia solani</i>) **Zoysia Patch (<i>Rhizoctonia solani</i>) (EXCEPT CALIFORNIA.)		
***Gray Leaf Spot (<i>Pyricularia grisea</i>). EXCEPT CALIFORNIA.		
****Fairy Ring (including <i>Marasmius</i> spp., <i>Lepiota</i> , spp. and <i>Agarius</i> spp.) (ALL STATES)	1 oz/1000 square feet in minimum of 2 gallons of water (0.27 lb ai/acre in 88 gallons of water)	<ul style="list-style-type: none"> • Make two-three applications on a 7-day interval schedule. • Use a penetrating wetting agent (such as primer or equivalent). • Immediately following application, water in the treatment with sufficient irrigation (0.5-1") to wet the active root zone.
Notes: <ul style="list-style-type: none"> • Control • ** Aids in control • *** Aids in suppression • ****Suppression and short term control • ¹Consult your local extension agent or local recommendations for information relating to proper timing for control of these diseases. • Use in alternation with fungicides that have different modes of action. 		

ORNAMENTALS		
Foliar Diseases	Rate	Application Notes
*Botrytis blight (<i>Botrytis cinerea</i>)	0.25 – 0.5 lb/100 gal/acre 0.03 – 0.06 lb ai/100 gal/acre	<ul style="list-style-type: none"> • Apply as a foliar spray every 7 – 10 days. • Apply prior to disease development and when conditions are conducive to disease development.¹
*Alternaria blight (<i>Alternaria panax</i>)	0.5 lb/100 gal 0.06 lb ai/100 gal/acre	
Root and Crown Diseases	Rate	Application Notes
*Rhizoctonia root and crown rot (<i>Rhizoctonia solani</i>)	0.25 – 0.5 lb/100 gal/acre 0.03 – 0.06 lb ai/100 gal/acre	<ul style="list-style-type: none"> • Apply as a soil drench every 14 – 28 days.
Notes: <ul style="list-style-type: none"> • * Control • ¹Consult your local extension agent or local recommendations for information relating to proper timing for control of these diseases. • Use in alternation with fungicides that have different modes of action. 		

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store in dry place away from food or feed.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed, by State and local authorities, by burning. If burned, stay out of smoke.

FOR 24-HOUR CHEMICAL EMERGENCY
(Spill, Leak, Fire or Accident) **ASSISTANCE:**
CALL CHEMTREC 1-800-424-9300

CONDITIONS OF SALE

1. Arysta LifeScience North America Corporation warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in accordance with the Directions for Use under normal conditions of use.
2. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Arysta LifeScience North America. **ARYSTA LIFESCIENCE NORTH AMERICA DISCLAIMS ALL OTHER WARRANTIES, EXPRESSED OR IMPLIED, INCLUDING ANY WARRANTY OF FITNESS OR MERCHANTABILITY. TO THE EXTENT PERMITTED BY LAW, SELLER SHALL NOT BE LIABLE FOR CONSEQUENTIAL SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. TO THE EXTENT PERMITTED BY LAW, SELLER'S LIABILITY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE. ARYSTA LIFESCIENCE NORTH AMERICA DOES NOT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTY, GUARANTEE OR REPRESENTATION CONCERNING THIS PRODUCT.**
3. Critical and unforeseeable factors beyond Arysta LifeScience North America's control prevent Arysta LifeScience North America from eliminating all risks in connection with the use of this product. Such risks include, but are not limited to, damage to plants and crops to which the product is applied, lack of complete control, and damage caused by drift to other plants or crops. Such risks occur even though the product is reasonably fit for the use stated on the label and even though label directions are followed. Except as stated in 1 above, to the extent permitted by law, Buyer and User acknowledge and assume all risks and liabilities resulting from handling, storage, and use of this product.

ENDORSE[®] is a registered trademark of Arysta LifeScience North America Corporation.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAR 30 2006

Doina Bujor, Project Manager
Registrations and Regulatory Affairs
Arysta LifeScience North America
100 First Street, Suite 1700
San Francisco, CA 94105

Subject: Label Amendment Applications Dated December 19, 2005
Product Name: ENDORSE® Water Dispersible Granules
EPA Registration Numbers: 66330-56 and 68173-3

Dear Ms. Bujor:

The amendments referred to above, submitted in connection with registration under FIFRA section 3(c)(5), will not be approved until revisions are made as described below:

1. EPA Form 8570-1 is not complete and Section III, 4. is not filled in. The size of the retail container affects some of BPB's responses to these label amendment requests, particularly as the information is not given on the labels.
2. BPB policy is to secure final printed labels (FPL) from the most recent approved amendment prior to initiating review of subsequent label amendment requests. Issuance of gold seals also requires the most current FPL be on file. However, the Agency will make a one-time-only exception to this requirement because of your explanation that no FPL is available for these products because they were not marketed (projected to occur once the subject amendments are accepted).
3. OPP encourages registrants to provide a company phone number with their street address on the label, as was done with EPA Reg. Nos. 66330-41 and 68173-2, and per PR Notices 97-4, 2001-1.
4. The label amendment request asks to add "Ornamentals" to the pesticide use sites, and the front page of the label makes that addition. Will "Ornamentals" also include Ornamental Turf, i.e., turf to be harvested as sod, which would be WPS-subject, as opposed to turf in parks or golf courses which is not WPS-subject?

CONCURRENCES

SYMBOL	7511C	7511C	7511C					
SURNAME	FRAZER	Peterson	Ruell					
DATE	3/24/06	3/30/06	3/30/06					

5. The **FIRST AID** and **PRECAUTIONARY STATEMENTS** should be parallel, i.e., if the first section of **FIRST AID** is "If on skin or clothing," the first statement in the **PRECAUTIONARY STATEMENTS** should be "Harmful if absorbed through the skin, swallowed or inhaled." If you wish to begin the **PRECAUTIONARY STATEMENTS** with the "Causes moderate eye irritation," you should switch the **FIRST AID** around to begin with "If in eyes...."
6. In as much as you incorporate a **NON-AGRICULTURAL USE REQUIREMENTS** box in the new label, **AGRICULTURAL USE** language is also required. This is because certain new uses, e.g., nurseries, are WPS-subject. Relevant language must be included to cover PPE and REI requirements in **PRECAUTIONARY STATEMENTS** as well. Note the default REI is 12 hours. To request a reduced REI of 4 hours you must address all criteria as outlined in PRN 95-3 or LRM 10-25.

The opposite problem exists with respect to **ENDORSE®** Wettable Powder Fungicide (EPA Reg. Nos. 66330-41 and 68173-2). Agricultural Use Requirements boxes are present, but there are no Non-Agricultural Use Boxes, even though these products are used on golf courses, residential lawns, etc. This disparity must be corrected as well.

7. Under **GENERAL INFORMATION**, you should probably bold the name **Fairy ring** to match all the other pest names. Repeat this detail for Reg. Nos. 66330-41 and 68173-2. In this section you state **ENDORSE®** Water Dispersible Granules also controls several fungal pests, but in the footnotes to the **TURF GRASSES** table, you state the product "Aids in control" of these pests. At the end of this section, you might add "...such as ...," to Ornamentals.
8. In the **MIXING AND APPLICATION** section, the registrant is not allowed to refer to "...diseases not specified on this label, such as Dollar Spot, are present or expected, it is appropriate to mix **ENDORSE®** Water Dispersible Granules...." This implies the product will act on that pest as well. If the intent is to address pests (diseases) targeted by other pesticides in tank mixes, the paragraph must be re-written to make this clear.
9. Also in the **MIXING AND APPLICATION** section, the third arrow mentions the Rate and Schedule section of label. There is no section with that labeling in any of the four products (EPA Reg. Nos. 66330-41 and -56, 68173-2 and -3), but you may wish to add those words to the following Table. The paragraph dealing with "Irrigation or rainfall" should be altered to include Fairy Ring treatment which requires immediate watering in both the previous and present products. Also, "on turf" should be inserted between "For best results" and "apply after mowing." The same language should be applied to the labels for 66330-41 and 68173-2.

10. In the labels for EPA Reg. Nos. 66330-41, 66330-56, 68173-2 and 68173-3, the Disease sections under **DIRECTIONS FOR USE, MIXING AND APPLICATION, TURF GRASSES** do not mention two diseases listed under **GENERAL INFORMATION, Red Thread** (*Laetisaria fuciformis*) and **Rhizoctonia Damping Off** (*Rhizoctonia solani*). How are these diseases supposed to be treated? Again, in the second paragraph in the **Application Notes**, both the present (66330-56, 68173-3) and previous (66330-41, 68173-2) products have the words "absorber interval." If you meant "a shorter interval," please correct accordingly.
11. In the **DIRECTIONS FOR USE, MIXING AND APPLICATION, TURF GRASSES Rate** for Fairy Ring treatment, you end with the phrase "(88 gallons of water/acre)." You previously stated it was "1 oz/1000 square feet in minimum of 2 gallons of water." This is confusing. Similar language is also used in the non-water soluble packaging sub-labels for 66330-41 and 68173-2. Is the applicator supposed to use the smaller amount on the Fairy Ring and then spray the 88 gallons/acre over the whole turf area? In the **Application Notes** for this section, the registrant states: "Use a penetrating wetting agent (such as primer or equivalent)." The term "primer" is not identified by BPPD.
12. Under the grouping **ORNAMENTALS** in the same section, the **Application Notes** for **Foliar Diseases** has two instructions: 1) "Apply as a foliar spray every 7 - 10 days," and, 2) "Apply prior to disease development and when conditions are conducive for disease." These statements are ambiguous and confusing. How can the customer know when to apply the pesticide without knowing when the disease develops? If the registrant means the grower should apply the product when conditions are conducive for disease, are those conditions so well-known they would not have to be stated on the label, or should they be provided? Further, if the grower is applying as a foliar spray every 7 - 10 days, would that preclude the necessity to apply prior to disease development? The same language is also present in 66330-41 and 68173-2 and could be improved. Please clarify.
13. In the **Rate** instruction for *Alternaria* blight on all four labels (66330-41, 66330-56, 68173-2, 68173-3), the second line is 0.06 lb ai/100 gal. All the other rate applications give a volume, i.e., gal/acre. Please make these instructions consistent.
14. In the **Application Notes** for Root and Crown Diseases, we assume the reference to a drench refers to a "soil drench." If this is correct, please insert "soil" before drench. Drenches are also found in several places in the **GINSENG** and **ORNAMENTALS** Tables in products 66330-41 and 68173-2. Please make the same changes.
15. In the Notes section at the end of the **ORNAMENTALS** table: you state "Use in alternation with fungicides that have different modes of action." Shouldn't this statement also apply to the **TURF GRASSES** and be included in 66330-41 and 68173-2 verbiage?

Doina Bujor, Project Manager
Label Amendment Application Dated December 19, 2005
Page Four (4)

Should you have any questions concerning this letter, please contact Carol Frazer, Ph.D.,
Regulatory Action Leader for this product by phone at 703-308-8810 or by e-mail at
frazer.carol@epa.gov.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sheryl K. Reilly".

Sheryl K. Reilly, Ph.D., Chief
Biochemical Pesticides Branch
Biopesticides and Pollution
Prevention Division (7511C)



"Bujor, Doina"
<doina.bujor@arystalifescien
ce.com>

03/01/2006 09:39 AM

To Carol Frazer/DC/USEPA/US@EPA
cc Denise Greenway/DC/USEPA/US@EPA

bcc

Subject RE: EPA Reg. No. 68173-3 and 66330-56 Label
Amendments Dated December 19,2005

Dear Carol,

This e-mail is in response to our conference call on Monday, February 27, 2006. Regarding final printed labels for Endorse WDG (EPA Reg. No. 66330-56 and 68173-3) they are not available at this time. We did not formulate yet the product. We would like to have it in the market, though, in the 2006 season. In the Notice of Pesticide Registration dated October 27, 2005 we are requested to submit 3 copies of the final printed labeling before the product is released for shipment. Our company decided not to commercialize the product until we have the ornamental uses on the label which is an important use for this formulation.

Please let me know if I can provide more information regarding this subject.

Best regards,

Doina

Doina Bujor

Project Manager/Sr. Chemist
Regulatory Affairs
15401 Weston Parkway, Suite 150
Cary, NC 27513
Tel: 919-678-4879
Fax: 919-678-2196
doina.bujor@arystalifescience.com

Harmony In Growth



Arysta LifeScience

December 19, 2005

Denise Greenway
Biopesticide and Pollution Prevention Division
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1801 Bell Street
Arlington, VA 22202-4501
Phone: (703) 308-8263

RE: ENDORSE Water Dispersible Granules (EPA Reg. No. 68173-3 and 66330-56)

Dear Ms. Greenway:

Arysta LifeScience North America Corporation is submitting a request to amend the Endorse Water Dispersible Granules labels EPA Reg. No. 68173-3 (Arysta as the agent for Kaken Pharmaceuticals) and 66330-56. The change made is the addition of a new use on ornamentals. This use was previously approved for the Endorse Wettable Powder Fungicide (EPA Reg. No. 68173-2 and EPA Reg. No. 66330-41). The use rate on the currently submitted labels is identical with the use rates on the approved Endorse Wettable Powder Fungicide.

Enclosed are the following documents:

- EPA Form 8570-1 for EPA Reg. No. 68173-3
- EPA Form 8570-1 for EPA Reg. No. 66330-41
- 1 copy of the redline label for EPA Reg. No. 68173-3
- 1 copy of the redline label for EPA Reg. No. 66330-56
- 5 copies of the clean draft label for EPA Reg. No. 68173-3
- 5 copies of the clean draft label for EPA Reg. No. 66330-56

We believe that this submission qualifies as a fast track review.

If you have any questions in this matter please contact me at (415) 778-4876 or by email at doina.bujor@arystalifescience.com.

~~5015-67-8142~~
Sincerely,

Doina Bujor
Project Manager - Polyoxin
Registrations and Regulatory Affairs
Arysta LifeScience North America
100 First Street, Suite 1700
San Francisco, CA 94105

415-678-4879

Arysta LifeScience North America

100 First Street, Suite 1700, San Francisco, California USA 94105 Telephone: (415) 415-535 3480 Fax: (415) 415-284-9883

www.arystalifescience.com

		United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input checked="" type="checkbox"/> Amendment <input type="checkbox"/> Other	OPP Identifier Number
Application for Pesticide - Section I				
1. Company/Product Number 66330-56		2. EPA Product Manager Denise Greenway		3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) ENDORSE Water Dispersible Granules		PM# 91		
5. Name and Address of Applicant (include ZIP Code) Arysta LifeScience North America Corporation 100 First Street, Suite 1700 San Francisco, CA 94105 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____		
Section - II				
<input checked="" type="checkbox"/> Amendment - Explain below.				
<input type="checkbox"/> Resubmission in response to Agency letter dated _____				
<input type="checkbox"/> Notification - Explain below.				
<input type="checkbox"/> Final printed labels in response to Agency letter dated _____				
<input type="checkbox"/> "Me Too" Application.				
<input type="checkbox"/> Other - Explain below.				
Explanation: Use additional page(s) if necessary. (For section I and Section II.) Added new use on ornamentals				
Section - III				
1. Material This Product Will Be Packaged In:				
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Unit Packaging wgt. _____ No. per container _____	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Package wgt. _____ No. per container _____	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____		
Section - IV				
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)				
Name Doina Bujor		Title Regulatory Manager		Telephone No. (include Area Code) 415-778-4876
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.				6. Date Application Received (Stamped)
2. Signature 		3. Title Regulatory Manager		
4. Typed Name Doina Bujor		5. Date December 19, 2005		

ENDORSE® Water Dispersible Granules

For use on Turf and Ornamentals

GROUP	19	FUNGICIDE
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ACTIVE INGREDIENT:

Polyoxin D zinc salt 11.3%

OTHER INGREDIENTS: 88.7%

TOTAL..... 100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE SIDE/BACK PANEL FOR FIRST AID AND ADDITIONAL PRECAUTIONARY
STATEMENTS.

EPA Reg. No. 66330-56 _____

EPA EST. No. _____

Net weight: _____

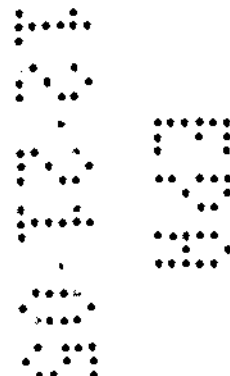
Produced for:

Arysta LifeScience

North America Corporation

100 First Street, Suite 1700

San Francisco, CA 94105



FIRST AID	
If on skin or clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
If swallowed	<ul style="list-style-type: none"> • Call poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE: CALL 1-800-228-5635 Ext. 174	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Causes moderate eye irritation. Harmful if absorbed through the skin, swallowed or inhaled. Avoid contact with skin, eyes or clothing. Avoid breathing dust or spray mist. Wash thoroughly with soap and water after handling. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

This pesticide is moderately toxic to aquatic invertebrates and fish. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment

washwater or rinsate. Do not allow runoff into lakes, streams, ponds or public waterways. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas.

Granules exposed on soil surface may be hazardous to fish and aquatic invertebrates. Collect granules spilled during loading.

Observe the most restrictive of the labeling limitations and precautions of all products used in mixtures.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in the box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries or greenhouses. Keep children and pets out of treated area until sprays have dried.

GENERAL INFORMATION

ENDORSE Water Dispersible Granules is for use on golf courses, residential lawns, parks, and commercial and institutional grounds composed of cool and warm season grasses such as Bluegrass, Bentgrass, Fescue, Ryegrass, Zoysiagrass, or their mixtures.

ENDORSE Water Dispersible Granules is a systemic, foliar applied turf fungicide for control of **Brown Patch** and **Large Patch** caused by *Rhizoctonia* spp. and for the suppression and short term control of Fairy Ring caused by the various *Basidiomycetes* fungal pathogens including *Marasmius* spp., *Lepiota* spp. and *Agarius* spp. (ALL STATES)

ENDORSE Water Dispersible Granules also controls **Cool Weather Brown Patch (Yellow Patch)** (*Rhizoctonia cerealis*), **Follar and Basal Anthracnose** (*Colletotrichum graminicola*), **Gray Snow Mold** (*Typhula ishikariensis* and *Typhula incarnata*), **Leaf Spot/Melting Out** (*Drechslera poae*), **Pink Snow Mold** (*Microdochium nivale*), **Red Thread** (*Laetisaria fuciformis*), **Rhizoctonia Damping Off** (*Rhizoctonia solani*), and **Zoysia Patch** (*Rhizoctonia solani*) on cool and warm season turf grasses. (EXCEPT CALIFORNIA)

ENDORSE Water Dispersible Granules also aids in the suppression of **Gray Leaf Spot** (*Pyricularia grisea*). (EXCEPT CALIFORNIA)

Apply ENDORSE Water Dispersible Granules as a preventive or curative treatment in conjunction with good turf management practices.

ENDORSE Water Dispersible Granules also controls Botrytis blight (*Botrytis cinerea*), Alternaria blight (*Alternaria* spp.) and Rhizoctonia root and crown rot (*Rhizoctonia solani*) on Ornamentals.

RESISTANCE MANAGEMENT RECOMMENDATIONS

ENDORSE Water Dispersible Granules contains a Group 19 fungicide. Fungal isolates with acquired resistance to Group 19 may eventually dominate the fungal population if Group 19 fungicides are used repeatedly in the same field or in successive years as the primary method of control for targeted species. This may result in partial or total loss of control of those species by ENDORSE Water Dispersible Granules or other Group 19 Fungicides.

To delay fungicide resistance, consider:

- Avoiding the consecutive use of ENDORSE Water Dispersible Granules or other target site of action Group 19 fungicides that have a similar target site of action, on the same pathogens.
- Using tank-mixtures or premixes with fungicides from different target site of action Groups as long as the involved products are all registered for the same use and are both effective at the tank mix or prepack rate on the pathogen(s) of concern.
- Basing fungicide use on a comprehensive IPM program.
- Monitoring treated fungal populations for loss of field efficacy.
- Contacting your local extension specialist, certified crop advisors, and/or manufacturer for fungicide resistance management and/or IPM recommendations for specific crops and resistant pathogens.

MIXING AND APPLICATION

When diseases not specified on this label, such as Dollar Spot, are present or expected, it is appropriate to mix ENDORSE Water Dispersible Granules with appropriately labeled fungicides. When tank mixing ENDORSE Water Dispersible Granules with other products, observe all precautions and limitations on each separate product label. It is always advisable to conduct a tank mix compatibility test when you plan to mix this product with other products. To determine the physical compatibility of this product with other products, use a jar test. Using a quart jar, add the proportionate amounts of the products to approximately one quart of water with agitation. Add dry formulations first, then flowables, then emulsifiable concentrates last. After thorough mixing, allow this mixture to stand for 5 minutes. If the combination remains mixed or can be readily remixed, it is physically compatible. Once compatibility has been proven, use the same procedure for adding required ingredients to the spray tank. To assess the potential for phytotoxicity, test tank mixtures on a small number of plants prior to more widespread application.

Do not apply this product through any type of irrigation system.

Mixing instructions for ENDORSE Water Dispersible Granules:

- Fill spray tank with water to ½ of the intended final volume.
- Start spray tank agitation.
- Add the appropriate amount of product to the tank (refer to Rate and Schedule section of label). Follow the directions above for mixing other products in the spray tank.
- Agitate to ensure thorough mixing while adding the remaining required water.
- DO NOT allow the spray mixture to stand without agitation.

Mix only the amount of spray solution needed to treat the desired area.

For optimum control of labeled diseases, apply ENDORSE Water Dispersible Granules with sufficient water to provide a thorough coverage.

Irrigation or rainfall soon after treatment with ENDORSE Water Dispersible Granules will decrease disease control. For best control, do not irrigate for 12 hours after treatment.

For best results, apply after mowing.

TURF GRASSES		
Disease	Rate	Application Notes
*Brown Patch *Large Patch (ALL STATES)	2.4 lbs/acre (0.27 lb active ingredient/acre) in a minimum of 88 gallons of water/acre	<ul style="list-style-type: none"> • Repeat treatment on a 7-14 day schedule where environmental conditions are conducive to development of diseases. • When symptoms are present, best control will be achieved by using absorber interval. • For best results apply after mowing.
**Cool Weather Brown Patch (Yellow Patch) (<i>Rhizoctonia cerealis</i>), **Foliar and Basal Anthracnose (<i>Collectotrichum graminicola</i>), **Gray Snow Mold (<i>Typhula ishikariensis</i> and <i>Typhula incarnate</i>), **Leaf Spot/Melting Out (<i>Dreschlera poae</i>), **Pink Snow Mold (<i>Microdochium solani</i>), and **Zoysia Patch (<i>Rhizoctonia solani</i>) on cool and warm season turf grasses. (EXCEPT CALIFORNIA.)		
***Gray Leaf Spot (<i>Pyricularia grisea</i>). EXCEPT CALIFORNIA.		

****Fairy Ring (including <i>Marasmius</i> spp., <i>Lepiota</i> , spp. and <i>Agarius</i> spp.) (ALL STATES)	1 oz/1000 square feet in minimum of 2 gallons of water (0.275 lb ai/acre) (88 gallons of water/acre)	<ul style="list-style-type: none"> • Make two-three applications on a 7-day interval schedule. • Use a penetrating wetting agent (such as primer or equivalent). Immediately following application, water in the treatment with sufficient irrigation (0.5-1") to wet the active root zone.
Notes: * Control ** Aids in control *** Aids in suppression ****Suppression and short term control.		

ORNAMENTALS		
Foliar Diseases	Rate	Application Notes
Botrytis blight (<i>Botrytis cinerea</i>)	0.25 – 0.5 lb/100 gal/acre 0.03 – 0.06 lb ai/100 gal/acre	<ul style="list-style-type: none"> • Apply as a foliar spray every 7 – 10 days. • Apply prior to disease development and when conditions are conducive for disease.
Alternaria blight (<i>Alternaria panax</i>)	0.5 lb/100 gal 0.06 lb ai/100 gal	
Root and Crown Diseases	Rate	Application Notes
Rhizoctonia root and crown rot (<i>Rhizoctonia solani</i>)	0.25 – 0.5 lb/100 gal/acre 0.03 – 0.06 lb ai/100 gal/acre	<ul style="list-style-type: none"> • Apply as a drench every 14 – 28 days.
Notes: <ul style="list-style-type: none"> • Use in alternation with fungicides that have different modes of action. 		

STORAGE AND DISPOSAL
Do not contaminate water, food or feed by storage or disposal.
PESTICIDE STORAGE: Store in dry place away from food or feed.
PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.
CONTAINER DISPOSAL: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed, by State and local authorities, by burning. If burned, stay out of smoke.

FOR 24-HOUR CHEMICAL EMERGENCY (Spill, Leak, Fire or Accident) ASSISTANCE:

CALL CHEMTREC 1-800-424-9300

CONDITIONS OF SALE

1. Arysta LifeScience North America Corporation warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in accordance with the Directions for Use under normal conditions of use.
2. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Arysta LifeScience North America. **ARYSTA LIFESCIENCE NORTH AMERICA DISCLAIMS ALL OTHER WARRANTIES, EXPRESSED OR IMPLIED, INCLUDING ANY WARRANTY OF FITNESS OR MERCHANTABILITY. TO THE EXTENT PERMITTED BY LAW, SELLER SHALL NOT BE LIABLE FOR CONSEQUENTIAL SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. TO THE EXTENT PERMITTED BY LAW, SELLER'S LIABILITY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE. ARYSTA LIFESCIENCE NORTH AMERICA DOES NOT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTY, GUARANTEE OR REPRESENTATION CONCERNING THIS PRODUCT.**
3. Critical and unforeseeable factors beyond Arysta LifeScience North America's control prevent Arysta LifeScience North America from eliminating all risks in connection with the use of this product. Such risks include, but are not limited to, damage to plants and crops to which the product is applied, lack of complete control, and damage caused by drift to other plants or crops. Such risks occur even though the product is reasonably fit for the use stated on the label and even though label directions are followed. Except as stated in 1 above, to the extent permitted by law, Buyer and User acknowledge and assume all risks and liabilities resulting from handling, storage, and use of this product.

ENDORSE[®] is a registered trademark of Arysta LifeScience North America Corporation.



U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Biopesticides and Pollution Prevention Division (7511C)
1200 Pennsylvania Avenue NW
Washington, DC 20460

EPA Reg. Number:

66330-56

Date of Issuance:

10/27/05

NOTICE OF PESTICIDE:

☒ Registration
☐ Reregistration

(under FIFRA, as amended)

Term of Issuance:

Unconditional

Name of Pesticide Product:

Endorse® Water Dispersible Granules

Name and Address of Registrant (Include ZIP Code):

Arysta LifeScience North America Corporation
100 First Street, Suite 1700
San Francisco, CA 94105

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Biopesticides and Pollution Prevention Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This registration does not eliminate the need for continual reassessment of the pesticide. If EPA determines at any time, that additional data are required to maintain in effect an existing registration, the Agency will require submission of such data under section 3(c)(2)(B) of FIFRA.

This product is registered in accordance with FIFRA section 3(c)(5) and is subject to the following terms and conditions:

1. Change "EPA Reg. No. 66330-LA" on the label to, "EPA Reg. No. 66330-56."

Signature of Approving Official:

JZH

(See second page for signature)

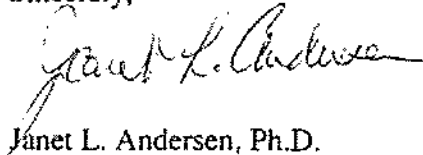
Date:

10/27/05

2. Submit three (3) copies of the revised final printed labeling before you release the product for shipment. Refer to the A-79 enclosure for a further description of final printed labeling.

A stamped copy of the label is enclosed for your records.

Sincerely,



Janet L. Andersen, Ph.D.

Director

Biopesticides and Pollution

Prevention Division (7511C)

Enclosures (2)

ENDORSE® Water Dispersible Granules

GROUP	19	FUNGICIDE
-------	----	-----------

ACTIVE INGREDIENT:

Polyoxin D zinc salt 11.3%

OTHER INGREDIENTS: 88.7%

TOTAL..... 100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

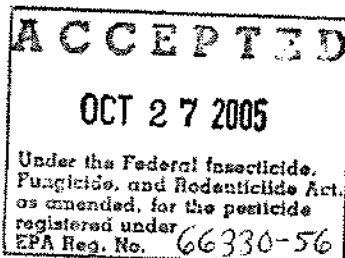
SEE SIDE/BACK PANEL FOR FIRST AID AND ADDITIONAL PRECAUTIONARY STATEMENTS.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Causes moderate eye irritation. Harmful if absorbed through the skin, swallowed or inhaled. Avoid contact with skin, eyes or clothing. Avoid breathing dust or spray mist. Wash thoroughly with soap and water after handling. Remove and wash contaminated clothing before reuse.



FIRST AID	
If on skin or clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
If swallowed	<ul style="list-style-type: none"> • Call poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
<p align="center">FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE: CALL 1-800-228-5635 Ext. 174</p>	

ENVIRONMENTAL HAZARDS

This pesticide is moderately toxic to aquatic invertebrates and fish. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate. Do not allow runoff into lakes, streams, ponds or public waterways. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas.

Granules exposed on soil surface may be hazardous to fish and aquatic invertebrates. Collect granules spilled during loading.

Observe the most restrictive of the labeling limitations and precautions of all products used in mixtures.

EPA Reg. No. 66330-LA
EPA EST. No. _____
Net weight 2 pounds, 6.4 ounces (2.4 lbs)

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

GENERAL INFORMATION

ENDORSE Water Dispersible Granules is NOT for use on turf being grown (1) for sale or other commercial use as sod, (2) for commercial seed production, or (3) for research purposes.

ENDORSE Water Dispersible Granules is for use on golf courses, residential lawns, parks, and commercial and institutional grounds composed of cool and warm season grasses such as Bluegrass, Bentgrass, Fescue, Ryegrass, Zoysiagrass, or their mixtures.

ENDORSE Water Dispersible Granules is a systemic, foliar applied turf fungicide for control of **Brown Patch** and **Large Patch** caused by *Rhizoctonia* spp. ENDORSE Water Dispersible Granules also controls **Cool Weather Brown Patch (Yellow Patch)** (*Rhizoctonia cerealis*), **Foliar and Basal Anthracnose** (*Colletotrichum graminicola*), **Gray Snow Mold** (*Typhula ishikariensis* and *Typhula incarnata*), **Leaf Spot/Melting Out** (*Dreschlera poae*), **Pink Snow Mold** (*Microdochium nivale*), **Red Thread** (*Laetisaria fuciformis*), **Rhizoctonia Damping Off** (*Rhizoctonia solani*), and **Zoysia Patch** (*Rhizoctonia solani*) on cool and warm season turf grasses.

ENDORSE Water Dispersible Granules also aids in the suppression of **Gray Leaf Spot** (*Pyricularia grisea*).

Apply ENDORSE Water Dispersible Granules as a preventive or curative treatment in conjunction with good turf management practices.

RESISTANCE MANAGEMENT RECOMMENDATIONS

ENDORSE Water Dispersible Granules contains a Group 19 fungicide. Fungal isolates with acquired resistance to Group 19 may eventually dominate the fungal population if Group 19 fungicides are used repeatedly in the same field or in successive years as the primary method of control for targeted species. This may result in partial or total loss of control of those species by ENDORSE Water Dispersible Granules or other Group 19 Fungicides.

To delay fungicide resistance, consider:

- Avoiding the consecutive use of ENDORSE Water Dispersible Granules or other target site of action Group 19 fungicides that have a similar target site of action, on the same pathogens.

- Using tank-mixtures or premixes with fungicides from different target site of action Groups as long as the involved products are all registered for the same use and are both effective at the tank mix or prepack rate on the pathogen(s) of concern.
- Basing fungicide use on a comprehensive IPM program.
- Monitoring treated fungal populations for loss of field efficacy.
- Contacting your local extension specialist, certified crop advisors, and/or manufacturer for fungicide resistance management and/or IPM recommendations for specific crops and resistant pathogens.

MIXING AND APPLICATION

When diseases not specified on this label, such as Dollar Spot, are present or expected, it is appropriate to mix ENDORSE Water Dispersible Granules with appropriately labeled fungicides. When tank mixing ENDORSE Water Dispersible Granules with other products, observe all precautions and limitations on each separate product label. It is always advisable to conduct a tank mix compatibility test when you plan to mix this product with other products. To determine the physical compatibility of this product with other products, use a jar test. Using a quart jar, add the proportionate amounts of the products to approximately one quart of water with agitation. Add dry formulations first, then flowables, then emulsifiable concentrates last. After thorough mixing, allow this mixture to stand for 5 minutes. If the combination remains mixed or can be readily remixed, it is physically compatible. Once compatibility has been proven, use the same procedure for adding required ingredients to the spray tank. To assess the potential for phytotoxicity, test tank mixtures on a small number of plants prior to more widespread application.

Do not apply this product through any type of irrigation system.

Mixing instructions for ENDORSE Water Dispersible Granules:

- Fill spray tank with water to $\frac{1}{2}$ of the intended final volume.
- Start spray tank agitation.
- Add the appropriate amount of product to the tank (refer to Rate and Schedule section of label). Follow the directions above for mixing other products in the spray tank.
- Agitate to ensure thorough mixing while adding the remaining required water.
- DO NOT allow the spray mixture to stand without agitation.

Mix only the amount of spray solution needed to treat the desired area.

For optimum control of labeled diseases, apply ENDORSE Water Dispersible Granules with sufficient water to provide a thorough coverage.

Irrigation or rainfall soon after treatment with ENDORSE Water Dispersible Granules will decrease disease control. For best control, do not irrigate for 12 hours after treatment.

For best results, apply after mowing.

RATE AND SCHEDULE

Apply 2.4 lbs (1 bag) of ENDORSE Water Dispersible Granules per acre (0.27 lbs active ingredient/acre) in a minimum of 88 gallons of water per acre.

Repeat treatment on a 7-14 day schedule as necessary when environmental conditions are conducive to development of disease. When disease symptoms are present, best control will be achieved by using a shorter interval.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store in dry place away from food or feed.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed, by State and local authorities, by burning. If burned, stay out of smoke.

**FOR 24-HOUR CHEMICAL EMERGENCY
(Spill, Leak, Fire or Accident) ASSISTANCE:
CALL CHEMTREC 1-800-424-9300**

CONDITIONS OF SALE

1. Arysta LifeScience North America Corporation warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in accordance with the Directions for Use under normal conditions of use.
2. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Arysta LifeScience North America. **ARYSTA LIFESCIENCE NORTH AMERICA DISCLAIMS ALL OTHER WARRANTIES, EXPRESSED OR IMPLIED, INCLUDING ANY WARRANTY OF FITNESS OR MERCHANTABILITY. TO THE EXTENT PERMITTED BY LAW, SELLER SHALL NOT BE LIABLE FOR CONSEQUENTIAL SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. TO THE EXTENT PERMITTED BY LAW, SELLER'S LIABILITY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE. ARYSTA LIFESCIENCE NORTH AMERICA DOES NOT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTY, GUARANTEE OR REPRESENTATION CONCERNING THIS PRODUCT.**
3. Critical and unforeseeable factors beyond Arysta LifeScience North America's control prevent Arysta LifeScience North America from eliminating all risks in connection with the use of this product. Such risks include, but are not limited to, damage to plants and crops to which the product is applied, lack of complete control,

and damage caused by drift to other plants or crops. Such risks occur even though the product is reasonably fit for the use stated on the label and even though label directions are followed. Except as stated in 1 above, to the extent permitted by law, Buyer and User acknowledge and assume all risks and liabilities resulting from handling, storage, and use of this product.

ENDORSE® is a registered trademark of Arysta LifeScience North America Corporation.

Produced for:
Arysta LifeScience North America Corporation
100 First Street, Suite 1700
San Francisco, CA 94105

Receipt for Section 3

S: 781048

Regulatory Type: Product Registration - Section 3 ☐ Yes ☒ No

Application Type: Pending Product Amendment ☐ Yes ☒ No

Company: 68330 ARVESTA CORPORATION ☒ Y

Risk Manager: Biologicals & Pollution Prevention Division, PM Team 91

Product #: 68330-LA Product Name: ENDORSE WATER DISPERSIBLE GRANULES

Me Too Section 3: Me Too Product Name:

Application Date: 29-Jun-2005 ☒ ipj OPP Rec'd Date: 30-Jun-2005 ☒ ipj

Front End Date: 30-Jun-2005 ☒ ipj Risk Manager Send Date: 30-Jun-2005 ☒ ipj

FFS Due Date: Negotiated Due Date:

OPP Target Date:

Fast Track: ☐ New Ingredients: ☐

Receipt Description: acute inhalation toxicity data

Form A: ☐ Signature Date: Form B: ☐ Signature Date:

None Ingredient Request Date: None Ingredient Received Date:

Receipt Content: Study

Print Letter

Enter More Information

out of PRIA

See D Hudson notes on 68173-6

8/5/05 If these data are
acceptable, the 2 appl.
will be ready to register.
All else is OK.

BZB

AIO
AUG 2 2005

Adh
97

Screen Packages #05-11

Date: July 21, 2005

NON-PRIA 166

Tetrahedron, Inc. shall assist Agency in receiving and reviewing incoming registration packages from potential registrants. Tetrahedron Inc. shall provide the personnel and services to ensure that registration packages are complete and in compliance with EPA requirements

For technical/scientific questions that cannot be resolved by the Tetrahedron without input from BPPD science staff, the Tetrahedron shall contact: Linda Hollis 703-308-8733

EPA RAL Reviewer(s) for this work assignment is/are: Denise Greenway at 703-308-8263

EPA Reg. No.	Company	Product Name	Active Ingredients	Est. hours	Act. hou
68173-G-6630- LA DLA 8/5/05	Arvesta Corporation	Endorse Water Dispersible	Polydim-D	4	4
Total Est. Hours				4	

Nasrin Begum: Nasrin Begum Return Date: 7/28/05

Notes: If this Data Screen Package is over the Est. 4 Hours, please explain the reason why.

RECEIVED
7/23/05

Phendix

ATTACHMENT 1

Administrative Material Screening Checklist

Date: 7/27/05

EPA Reg. No. : 68173-G and 66330-LA

8/15/05

Active Ingredient name: Polyoxin D Zinc salt Technical 23.8%

Division RAL assigned (if any): Denise Greenway

PASSED:

Main Materials	Signed		Date	Absent	Comments
	Yes	No			
Form 8570-1	X		7/21/04		
CSF - Completely filled out & original signature (EPA form 8570-4)	X		2/7/05		
• inerts cleared?	y				
• conventional or antimicrobial actives present in formulation?	y				
• accurate information provided for suppliers/source?	y				
• csf accurately reflects label?	y				
• note all comments					
Method of Support, if so state which					selective
Label					
• legible product label?	Y				
• label accurately reflects csf?	Y				
• note all comments					
Physical address of manufacturer on label	Y				
Data Matrix - Two/one for jacket; one for FOIA (EPA Form 8570-35)	Y		7/21/04		
• supports method of support?					
• reflects information reported in transmittal document and company cover letter?					
• note all comments					
Formulator's exemption form (EPA form 8570-27)					

Admin Materials	Signed		Date	Absent	Comments
Transmittal letters <ul style="list-style-type: none"> accurately reflects what is reported on data matrix? note all comments 	Y		6/29/05		
Petition/amended petition if food tolerance or exemption/amended food tolerance or exemption <ul style="list-style-type: none"> petition# assigned? petition jacket included? petition complete with sections A-G? note all comments - if there is not evidence of a petition # assigned and sect. A-G not present, package fails. 					NA
FR template if food tolerance or exemption/amended food tolerance or exemption <ul style="list-style-type: none"> notice of filing template (disk) included? note all comments - a NOF must be present to establish a new tolerance exemption. Amendments to an existing tol. petition may be Agency initiated in which case a NOF would not expected to be present. (If unsure, check with branch team leader) 					NA
Certification with Respect to Citation of Data Form (EPA Form 8570-34) - if required	X		7/21/04		
Minutes on data requirements (pre-registration meeting)					NA
Active ingredient # (i.e. Chemical PC code) <ul style="list-style-type: none"> more than one active? are all actives housed in BPPD? 	N				P C 230000
Jacket from EPA Identifying Symbol					68173-G
Are MRIDS assigned? (State Yes/No in comments)					Y

Admin Materials	Signed	Date	Absent	Comments
Background Experimental Use Permit information, if applicable <ul style="list-style-type: none"> request for temporary tol. exempt, tol. exemption or numeric tolerance? note all comments - refer to petition and fr section for criteria. 				NA

Additional Comments:

CHECKLIST FOR DATA PACKAGE SCIENCE SCREEN

Active Ingredients: Polyoxin-D

PC code:230000

Product Name: Endorse Water Dispersible

EPA Reg. No/File Symbol: 48173-G/LA

Petition # (if applicable):

(Circle or Check Appropriate Boxes)

Product Type				
Biochemical, Microbial, or PIP		B	M	P
Food Use		Y	N	
Straight-chain Lepidopteran Pheromone (Biochemical Only)		Y	N	
New Active Ingredient		Y	N	
Sec. 3 Registration		Y	N	
Experimental Use Permit		Y	N	
IR-4 Submission		Y	N	
Methyl Bromide Alternative		Y	N	
Reduced Risk Product		Y	N	
Product Specific Information				
Data Requirement	TGAI	MP	EP	
Product Label			Y	
Product Chemistry				
CSF			Y	complete
Product Identity & Composition				cited in the data matrix as own study
Manufacturing Process				cited in the data matrix as own study
Description of the Formation of Impurities				cited in the data matrix as own study
Preliminary Analysis				cited in the data matrix as own study
Certified Limits				cited in the data matrix as own study
Analytical Methods				cited in the data matrix as own study
Physical/Chemical Properties (as shown in 40 CFR 158.190 Table)			Y	

Tier I Toxicity (If no study, indicate in Comments if waiver submitted)				
Acute Oral				cited in the data matrix as own study
Acute Dermal				cited in the data matrix as own study
Acute Inhalation				Study submitted MRID#465820-01 "Nose only inhalation toxicity study in rats with ENDORSE WDG" with this package
I.C., I.P., I.V. Injection (Microbial only)				
Primary Dermal Irritation				cited in the data matrix as own study
Primary Eye Irritation				cited in the data matrix as own study
Hypersensitivity (Conditionally required)				cited in the data matrix as own study
Hypersensitivity Incidents (Conditionally required)				
Genotoxicity Studies (Biochemical only)				
Immune Response				
Tissue Culture (Microbial only)				
90-day Feeding (Biochemical only)				
90-day Dermal (Biochemical only)				
90-day Inhalation (Biochemical only)				
Teratogenicity (Biochemical only)				
Tier I Non-Target Organisms (If no study, indicate in Comments if waiver submitted)				
Avian Acute Oral				
Avian Acute Dietary				
Freshwater Fish LC50				
Freshwater Invertebrate LC50				
Non-target Plants				
Non-Target Insects				
Honeybee Testing (Microbials only)				

Other Studies (As required by product specific data requirements(e.g. efficacy, residues))				

Science Screen Comment Form

Active Ingredients: Polyoxin D zinc salt

PC code: 230000

Product Name: ENDORSE Water Dispersible

EPA Reg. No/File Symbol: 68173-g/LA

RAL: Denise Greenway

Status: Pass

66330
822815105

THIS FORM DOES/DOES NOT CONTAIN CONFIDENTIAL BUSINESS INFORMATION

Product Chemistry: Data requirement is addressed by cited studies appears to be adequate

Toxicity:

Data requirement is addressed by cited studies appears to be adequate. A study titled (Nose only inhalation toxicity study in rats with ENDORSE WDG) submitted per Agency request with this submission.

Non-target Organisms/ Environmental Fate:

Product Performance (Efficacy):

Residue:

Other non guideline or supplemental information:

Comments/Recommendations: This is a re-submission with a study submission according to Agency's previous request. All other data requirement appears to be adequate.

BPPD Screen Package

Denise Greenway

RAL. 166 - non pria

Front End (Team Leader - Hollis.)

Product Name: Endorse Watergrambles

File Symbol No. 68173-9 & 66330-LA

FOOD

Active Ingredient: Glibenclamide

Non-FOOD

Date In BPPD: 7.5.05

X New Submission

Date To Screen Team: 7-18-05 7/25/05

☒ Resubmission

Package (RAI _____)

Pre-Registration Meeting Minutes: ☐ Yes ☐ None

See Administrative Material Checklist for information and comments on label, CSF, forms, etc.

Comment: Acute Nose (Only) Inhalation Toxicity Study

Jacket: ☐ Attached ☐ Not Present for Science Screen

Science Screen

Scientist: _____

Administrative Screens: ☒ Pass ☐ Fail

Seven Seven. 27-27.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

July 1, 2005

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

ARVESTA CORPORATION
100 FIRST STREET, SUITE 1700
SAN FRANCISCO, CA 94105

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 30-JUN-05. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

Arvesta Corporation
100 First Street, Suite 1700
San Francisco, CA 94105
Tel: (415) 836-3480
Fax: (415) 264-9683
www.arvesta.com

June 29, 2005

Denise Greenway
Biopesticide and Pollution Prevention Division
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1801 Bell Street
Arlington, VA 22202-4501
(703)308-8263

RE: ENDORSE WDG
(EPA Reg. No. 68173-G and EPA Reg. No. 66330-LA)

Dear Ms. Greenway:

According to the agreement between EPA and Arvesta Corporation we are submitting the acute inhalation toxicity study on behalf of Arvesta and also as an agent for Kaken Pharmaceutical Co., Ltd. to support section three registration for ENDORSE WDG (EPA Reg. No. 66330-LA and 68173-G).

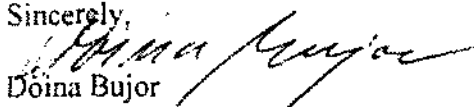
We understand that this action is not no longer under PRIA but we hope that since it is only one study for review you will be able to make a decision on this submission soon. Arvesta is appreciating your help on this matter.

Please consider the present letter as the Data Transmittal Document also.

46582001 OPPTS 870.1300 An Acute Nose-only Inhalation Toxicity Study in Rats with
Endorse WDG, Charles River Laboratories INC, June, 2005

Please notify Arvesta of the receipt of this document and the MRID number assigned to it. We would greatly appreciate receiving the Agency reviewer's comments as soon as they become available. If you have any questions or need other assistance in this matter, please contact me at (415) 778-4876 (dbujor@arvesta.com).

Sincerely,


Doina Bujor
Project Manager - Polyoxin
Registrations and Regulatory Affairs
Arvesta Corporation



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MAY 20 2005

Doina Bujor
Arvesta Corporation
100 First Street, Suite 1700
San Francisco, CA 94105

Re: Endorse® WDG (Water Dispersible Granule)
EPA File Symbols 66330-LA and 68173-G
Your Correspondence of March 29, 2005 and May 13, 2005

Dear Ms. Bujor:

On the behalf of your company, Arvesta Corporation, and also as the agent for Kaken Pharmaceutical Co. Ltd., you submitted, on March 29, 2005, a storage stability and corrosion characteristics study intended to support the section three registration of the two cited pending products, EPA File Symbols 66330-LA and 68173-G. The study was received in advance of the May 31, 2005 submission date established in a Biopesticides and Pollution Prevention Division (BPPD) letter of March 4, 2005, and was assigned Master Record Identification (MRID) number 465113-01.

The BPPD previously completed its review of the other data, data waiver requests and labels associated with these two actions, and our March 4, 2005 letter explained that, because the required acute inhalation toxicity study had not been adequately addressed, the Agency could not grant the two pending registration applications by the Pesticide Registration Improvement Act (PRIA) negotiated decision date of March 8, 2005. Therefore, the review of MRID 465113-01 was a non-PRIA activity. This letter informs you of the results of our review of the subject study. Please consult the enclosed memorandum (R. S. Jones to D. Greenway; May 12, 2005) for details.

Storage Stability and Corrosion Characteristics, MRID 465113-01

Acceptable. The active ingredient is stable and the product is not corrosive for up to 12 months in storage at 25°C.

CONCURRENCES							
SYMBOL	7511C	7511C	7511C				
SURNAME	Greenway	R. S. Jones	Ruell				
DATE	5/16/05	5/19/05	5/19/05				

Internet Address: URL: <http://www.epa.gov>
Recycled/Recyclable: 100% Recycled Ink Based on Recycled Paper (Minimum 20% Postconsumer)
109

It is my understanding from recent (May 2005) personal communication between yourself and Denise Greenway, of my staff, that you anticipate submitting an acute inhalation toxicity study (*i.e.*, you do not wish to withdraw the submissions or have them administratively withdrawn for failure to respond to the March 4, 2005 letter). And because the study reportedly is underway but not expected to be completed until June of 2005, you requested on May 13, 2005 an extension of the 75-day response time allotted by our March 4, 2005 letter. A data submission as described above will be handled as a non-PRIA action (no additional fees will be assessed and no decision due date will be set). We are in receipt of the electronic version of your May 13, 2005 request, and agree to extend until July 10, 2005 the time allotted for submission of the acute inhalation toxicity study. Please note that if the study is not received by July 10, 2005, your applications are subject to administrative withdrawal for failure to respond to the March 4, 2005 letter within the allotted (albeit, amended) time frame. After any such withdrawal, to further pursue the subject applications you will be required to submit *entire* new applications, which will be subject to PRIA fees and for which PRIA decision due dates will be guaranteed.

Should you have questions or concerns regarding this letter, please contact me, or telephone Ms. Greenway on (703) 308-8263.

Sincerely,



Sheryl K. Rcilly, Ph.D.

Chief

Biochemical Pesticides Branch

Biopesticides and Pollution

Prevention Division (7511C)

Enclosure

DGreenway/308-8263/5-13-2005/endorsessccrevltr.wpd.polyoxin D zinc salt

✓ Controlled low temperature polymerization of vinyl monomers
 (initiator \rightarrow active species \rightarrow polymerization)
 (Radical \rightarrow polymerization \rightarrow polymer)

AIO
 4-15-05
 adh

Registration Details

Company: 66330 ARVESTA CORPORATION

Risk Mgr: RM 91 Biologicals & Pollution Prevention Division, PM Team 91

Organization: BPPD / BPPB

Current Status: Under Review (22-Jul-2004)

Reg. Number: 66330-LA Pesticide Type: Biochemical

Use Type: EP Signal Word: Caution

Repeck: ☐ Yes ☒ No

NPIC Phone: ☐ Yes ☒ No 776706

VPS Written Notification: ☐ Yes ☒ No

Related Products

Use Patterns: ☒ Transfer History ☒ Toxicology ☒ Mode Of Action ☒ FR Notice ☒ Receipts

Product Name: ☒ Ingredient ☒ Formulation Property ☒ Pesticide Category ☒ Permitted State

PC Code	CAS Number	Ingredient Name	Percent/Wt Value
230000	146859-76-1	beta-D-Alofuramuronic acid, 5-((2-amino-5-O-(aminocarbonyl)-2-deoxy-L-xyloronic acid salt (1:1)	V 11.3

4:40 PM

Administrator Scan... Welcome - Lotus N... EPA-OPP IN Ma... WordPerfect 9 - D...

Per Resub RAL = Denise G.

two subs for: 66330-LA and 68173-g

Nasim

ATTACHMENT 1

Administrative Material Screening Checklist

Date: 4/6/05
 EPA Reg. No.: 66330-LA
 Active ingredient name: POLYOXIN-D zinc salt
 Division RAL assigned (if any):

PASSED:
 FAILED:

Admin Materials	Signed	Date	Absent	Comments
	Yes	No		
Form 8570-1	✓	7/2/04		CSF modified
CSF - Completely filled out & original signature (EPA form 8570-4)	✓	2/7/05		2/7/05 version of CSF is correct document
• inerts cleared?	✓			
• pc codes assigned to ingredients? If No, complete pcc request form, forward to Linda Fann, include copy in screening materials and Flag Team Leader	✓			
• conventional or antimicrobial actives present in formulation?	conventional			
• complete and/or accurate information provided for suppliers/source?	✓			
• csf accurately reflects label?	✓			
• note all comments				
Method of Support, if so state which	Selective			
Label				
• legible product label?	✓			
• label accurately reflects csf?	✓			
• note all comments				
Physical address of manufacturer on label	✓			

Admin Materials	Signed	Date	Absent	Comments
Data Matrix - Two/one for jacket; one for FOIA (EPA Form 8570-35) - original signature may not be present if copy <ul style="list-style-type: none"> • supports method of support? • reflects information reported in transmittal document and company cover letter? • note all comments 	✓	7/21/04		
Formulator's exemption form (EPA form 8570-27)			X	
Transmittal/Cover letters <ul style="list-style-type: none"> • accurately reflects what is reported on data matrix for EPA • Required data? • note all comments 		3/29/05		
Petition/amended petition if food tolerance or exemption/amended food tolerance or exemption <ul style="list-style-type: none"> • petition# assigned? • petition jacket included? • petition complete with sections A-G? • note all comments - if there is not evidence of a petition # assigned and sect. A-G not present, package fails. 			X	NA
EPA template if food tolerance or exemption/amended food tolerance or exemption <ul style="list-style-type: none"> • notice of filing template (disk) included? • note all comments - a NOF must be present to establish a new tolerance exemption. Amendments to an existing tol. petition may be Agency initiated in which case a NOF would not expected to be present. (if unsure, check with branch team leader) Flag team leader if deficient 				
Certification with Respect to Citation of Data Form (EPA Form 8570-34) - if required	✓	7/21/04		

Admin Materials	Signed	Date	Absent	Comments
Minutes on data requirements (pre-registration meeting)			✓	
Active ingredient # (i.e. Chemical PC code)				230000 (PC Code)
<ul style="list-style-type: none"> more than one active? are all actives housed in BPPD? 	Yes			
Jacket from EPA Identifying Symbol				66330-LA
Are MRIDS assigned? (State Yes/No in comments)			Yes	
Background Experimental Use Permit information, if applicable <ul style="list-style-type: none"> request for temporary tol. exempt, tol. exemption or numeric tolerance? note all comments - refer to petition and fr section for criteria. 			✓	

Additional Comments: Product chemistry ("storage stability & Corrosion characteristics" study) submitted in this package

CHECKLIST FOR DATA PACKAGE SCIENCE SCREEN

Active Ingredients: Polyoxin-D zinc salt

PC code: 230000

Product Name: ENDORSE WDG

EPA Reg. No/File Symbol: 66330-LA

Petition # (if applicable):

(Circle or Check Appropriate Boxes)

Product Type				
Biochemical, Microbial, or PIP		<input checked="" type="radio"/> B	<input type="radio"/> M	<input type="radio"/> P
Food Use		<input type="radio"/> Y	<input checked="" type="radio"/> N	
Straight-chain Lepidopteran Pheromone (Biochemical Only)		<input type="radio"/> Y	<input checked="" type="radio"/> N	
New Active Ingredient		<input type="radio"/> Y	<input checked="" type="radio"/> N	
Sec. 3 Registration		<input checked="" type="radio"/> Y	<input type="radio"/> N	
Experimental Use Permit		<input type="radio"/> Y	<input checked="" type="radio"/> N	
IR-4 Submission		<input type="radio"/> Y	<input checked="" type="radio"/> N	
Methyl Bromide Alternative		<input type="radio"/> Y	<input checked="" type="radio"/> N	
Reduced Risk Product		<input type="radio"/> Y	<input checked="" type="radio"/> N	
Product Specific Information				
Data Requirement	TGAI	MP	<input checked="" type="radio"/> EP	
Product Label				
Product Chemistry				
CSF				Modified CSF Submitted
Product Identity & Composition				
Manufacturing Process				
Description of the Formation of Impurities				
Preliminary Analysis				
Certified Limits				
Analytical Methods				
Physical/Chemical Properties (as shown in 40 CFR 158.190 Table)				Storage stability corrosion characteristics data submitted in this package.

CSF 8/27/05
is correct
& current
DLG
4/1/05

Tier I Toxicity (If no study, indicate in Comments if waiver submitted)				
Acute Oral				Toxicity data requirement is addressed by cited studies in the data matrix
Acute Dermal				
Acute Inhalation				
I.C., I.P., I.V. Injection (Microbial only)				
Primary Dermal Irritation				Not Present
Primary Eye Irritation				
Hypersensitivity (Conditionally required)				
Hypersensitivity Incidents (Conditionally required)				
Genotoxicity Studies (Biochemical only)				
Immune Response				
Tissue Culture (Microbial only)				
90-day Feeding (Biochemical only)				
90-day Dermal (Biochemical only)				
90-day Inhalation (Biochemical only)				
Teratogenicity (Biochemical only)				
Tier I Non-Target Organisms (If no study, indicate in Comments if waiver submitted)				
Avian Acute Oral				
Avian Acute Dietary				
Freshwater Fish LC50				
Freshwater Invertebrate LC50				
Non-target Plants				
Non-Target Insects				
Honeybee Testing (Microbials only)				
Other Studies (As required by product specific data requirements (e.g. efficacy, residues))				

Science Screen Comment Form

Active Ingredients: Polyoxin-D zinc salt

PC code: 230000

Product Name: ENDORSE WDG

EPA Reg. No/File Symbol: 66330-LA

RAL: Denise Greenway

Status: Pass or Fail

THIS FORM DOES/DOES NOT CONTAIN CONFIDENTIAL BUSINESS INFORMATION

Product Chemistry: Storage stability & corrosion study MRID#465113-01 submitted in this package appears to be adequate

Toxicity:

Acute toxicity data requirement is addressed by cited studies in the data matrix appears to be adequate

Non-target Organisms/ Environmental Fate:

Not present

Product Performance (Efficacy):

Not present

Residue:

Not present

Other non guideline or supplemental information:

NOT A Full (less) of package. ∴ these data requirements may have already been addressed.
LT 4/7/05

Comments/Recommendations:

Same study (MRID# 465113-01) to address data requirement for EPA Reg 66330-LA & 68173-G.

Date: 4/6/05

Checklist for Data Packages/Administrative Material (EPA Reg. No. 66330-LA)
(Active ingredient name: beta-D-Allofuranuronic acid, s-(2-amino-5-o-(aminocarbonyl)-2-deoxy-L-xylor/Polyoxin-D zinc salt)

Division RAL for this package: Denise Greenway

Passed: Screen: Nasrin Begum

Admin Materials	Signed		Date	Absent	Comments
	Yes	No			
Form 8570-1	X		7/21/04		Specific gravity and pH had been modified from the previous (dated 6/8/04) CSF submission
CSF - Completely filled out & original signature (EPA Form 8570-4)	X		2/7/05 <i>7/21/04 (current)</i>		<i>CSF date p22 4/11/05</i>
Method of Support	X		7/21/04		Selective method
Label				X	NA
Physical address of manufacturer on label	X				Present at the last page instead of front page
Data Matrix - Two/one for jacket; one for FOIA (EPA Form 8570-35)	X		7/21/04		
Formulator's exemption form (EPA Form 8570-27)					
Transmittal letters	X		3/29/05		
Petition/amended petition if food tolerance or exemption/amended food tolerance or exemption					
Label template if food tolerance or exemption/amended food tolerance or exemption					
Certification with Respect to Citation of Data Form (EPA Form 8570-34) - if required	X		7/21/04		
Minutes on data requirements (pre-registration meeting)					
Active ingredient # (i.e. Chemical PC code)					PC Code: 230000
Jacket from EPA Identifying Symbol					66330-LA
Are MRIDS assigned? (State Yes/No in comments)					Yes
Background Experimental Use Permit information, if applicable				X	NA



Arvesta Corporation
100 First Street, Suite 1700
San Francisco, CA 94103
tel: (415) 536-3450
fax: (415) 284-9883
www.arvesta.com

March 29, 2005

Denise Greenway
Biopesticide and Pollution Prevention Division
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1801 Bell Street
Arlington, VA 22202-4501

RE: ENDORSE WDG
(EPA Reg. No. 68173-G and EPA Reg. No. 66330-LA)

Dear Ms. Greenway:

Arvesta Corporation, as an agent for Kaken Pharmaceutical Co., Ltd, and on its own behalf is submitting the storage stability and corrosion study to support the registration of Endorse WDG (EPA Reg. No. 66330-LA and 68173-G). The title of the new study is:

48511301

TM-43802: Determination of Storage Stability and Corrosion Characteristics

Author: Yitlin Li and Kacia Baldwin

Date: 10 March 2005

Laboratory: Toxikon Corporation

Report Number: 03J0023b

OPPTS Guideline 830.6317 and 830.6320

We are submitting 3 (three) copies of this report.

Please consider the present letter as the Data Transmittal Document also.

Please notify Arvesta of the receipt of this document and the MRID number assigned to it. We would greatly appreciate receiving the Agency reviewer's comments as soon as they become available. If you have any questions or need other assistance in this matter, please contact me at (415) 778-4876 (dbujor@arvesta.com).

Sincerely,

Doina Bujor
Project Manager - Polyoxin
Registrations and Regulatory Affairs
Arvesta Corporation



"Bujor, Doina"
<dbujor@arvesta.com>

03/07/05 12:44 PM

To Denise Greenway/DC/USEPA/US@EPA

cc

bcc

Subject RE: 66330-LA and 68173-G

Dear Ms. Greenway,

Through the present I am authorizing you to transmit by fax the 3/4/05 Letter (Jones to Bujor). I am aware that the named document contains Confidential Business Information.

Best regards,

Doina



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460CANNOT GRANT H₁

MAR 4 2005

Doina Bujor
Avesta Corporation
Agent for Kaken Pharmaceutical Co., Ltd.
100 First Street, Suite 1700
San Francisco, CA 95105

RE: Applications and resubmission for Registration
dated July 21, 2004 and February 18, 2005, Respectively
Product Name: Endorse Water Dispersible Granules
EPA File Symbols: ~~66330-LA~~ and 68173-G

Dear Ms. Bujor:

On the behalf of your company, Arvesta Corporation, and also as the agent for Kaken Pharmaceutical Co., Ltd., you submitted on July 21, 2004, applications, data and information intended to support the section three registration of the two cited pending products, EPA File Symbols 66330-LA and 68173-G. The Biopesticides and Pollution Prevention Division (BPPD) reviewed the data and data waiver requests (R. D. Sjoblad to D. Greenway; December 1, 2004) associated with these two actions, and alerted you of deficiencies in a letter dated December 15, 2004 (J. L. Andersen to D. Bujor). You agreed to extend the Pesticide Registration Improvement Act (PRIA) decision time review period for these actions; the current, renegotiated PRIA decision date is March 8, 2005 (J. L. Andersen to D. Bujor, January 7, 2005). Label deficiencies associated with the applications were conveyed to you via our letter of February 7, 2004 (S. K. Reilly to D. Bujor). In response to the cited deficiency letters, you submitted a revised Confidential Statement of Formula (CSF) for each product on February 7, 2005; and revised labels on both February 10, 2005 and March 1, 2005. Also in response to the first deficiency letter, you submitted on February 18, 2005, a study (MRID 464485-01) in support of a request to waive the requirement to conduct an acute inhalation toxicity study. Our findings regarding these resubmissions are presented below. Please also consult the enclosed memorandum (D. Greenway to R. Gardner; March 3, 2005) for details.

CONCURRENCES

SYMBOL	7511C	7511C	7511C				
SURNAME	Greenway	Ridley	Andersen				
DATE	3/3/05	3/3/05	3/3/05				

Internet Address (URL) • <http://www.epa.gov>
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123

Product Chemistry

The revised CSFs for the two pending products, dated February 7, 2005, are acceptable. By May 31, 2005, you must submit for review by the Agency Pesticide Registration Notice 86-5 compliant reports on the corrosion characteristics and one-year storage stability studies.

Toxicology

The February 15, 2005, certification (D. Bujor to D. Greenway) is considered to be adequate confirmation that the test material used in the acute toxicity studies was of the same composition as Endorse Water Dispersible Granules.

Acute Inhalation Toxicity Data Waiver Request, MRID 464485-01

Unacceptable. The data and information, in combination with that submitted and reviewed on December 1, 2004, are inadequate to support the data waiver request. The data requirement is outstanding and may be addressed by either the submission of an acceptable study or a valid scientifically-based rationale supporting a waiver.

Draft Labels

Minor label deficiencies noted in your revised labels dated February 10, 2005, were relayed to you in Denise Greenway's e-mail of February 28, 2005. You responded by e-mailing further revisions on March 1, 2005. The March 1, 2005 version of both draft labels has been reviewed. No further label revisions are required at this time.

Therefore, the remaining impediment to the section three registration of your and your client's subject product applications is appropriate resolution of the outstanding acute inhalation toxicity study requirement. As discussed above, the current waiver request for the acute inhalation study is unacceptable.

Our records indicate that the renegotiated decision review period pursuant to the Pesticide Registration Improvement Act (PRIA) for the above-referenced applications ends on March 8, 2005. The Agency has completed its review of the application and resubmission.


On December 15, 2004, the Agency informed you that the applications were unacceptable and identified several deficiencies that required adequate resolution before the registrations for these products can be issued. Accordingly, in meeting its obligation to make a determination within the applicable PRIA decision review period, the Agency has determined that your and your client's registrations cannot be granted because the acute inhalation toxicity data requirement has still not been adequately addressed.

By regulation (40 CFR § 152.105), the Agency is obligated to give you 75 days in which to address the deficiencies identified in this deficiency notice. Therefore, the PRIA determination to not grant the subject applications is not a denial of those applications pursuant to section 3(c)(6) of FIFRA. However, if you wish to avail yourself of the procedural rights attendant to an Agency decision to deny your applications, you may inform the Agency of your

intention to not address the deficiencies identified in this letter and the Agency will begin the denial process by issuing a notice of denial. If, on the other hand, you wish to resolve the issues identified in this deficiency letter, the Agency will continue to diligently work with you in doing so. Absent unanticipated issues raised by your response to this deficiency letter or changes to other information in the registration application made by you, it is the Agency's expectation that resolution of the issues identified in this deficiency letter will result in the granting of your and your client's applications. While your and your client's applications are no longer under PRIA, we will continue to work on these applications if you submit either a valid waiver request for the acute inhalation toxicity study or an acceptable study for this data requirement within 75 days of the date of this letter. If you require an extension of this 75-day period, please contact Denise Greenway (greenway.denise@epa.gov or (703) 308-8263), as soon as possible.

If you have questions concerning this letter, please contact Dr. Sheryl K. Reilly, Chief, Biochemical Pesticides Branch, Biopesticides and Pollution Prevention Division, by telephone, 703-308-8712, or by e-mail at reilly.sheryl@epa.gov.

Sincerely,



James J. Jones, Director
Office of Pesticide Programs

Enclosure

DGreenway/308-8263/3-3-2005/endorsecannotgrant.wpd/polyoxinDzincsalt

ROUTING AND TRANSMITTAL SLIP

Date

3/3/05

For OPP Director Sign-Off

TO: (Name, office symbol, room number, building, Agency/Post)

1. J. Jones, OPP Director, please sign

2.

3.

4.

5.

Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	

REMARKS

re: 66330-LA and 6B173-G

"Cannot Grant" letter for PRIA actions w/a PRIA

Decision Date of 3/8/05

Deficiencies were identified in the original review. A new PRIA date was negotiated. The registrant made a timely resubmission, but BPPD review of the resubmission revealed that the acute inhalation toxicity data requirement still had not been adequately addressed by the revised data waiver request.

This letter informs the registrant of the deficiency, takes the actions out of PRIA, and offers options to the companies regarding their next steps.

Thank you for your attention to this letter. Please contact me should you have questions or concerns.

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions.

FROM: (Name, org. symbol, Agency/Post)

Room No.— Bldg.

(Fill in your info here)
Janet Andersen, Director
BPPD

Phone No.

3088128

RECEIVED

MAR 04 2005

4452



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

Greenway to Gardner

MEMORANDUM

SUBJECT: Request for Concurrence on Resubmissions in Response to Review
Dated December 1, 2004 (R. D. Sjoblad to D. Greenway)
EPA File Symbols 68173-G and 66330-LA; New Product, Old Chemical

FROM: Denise Greenway, Regulatory Action Leader
Biochemical Pesticides Branch
Biopesticides and Pollution Prevention Division (7511C)

Denise Greenway 3/3/2005

TO: Roger Gardner, Senior Scientist
Biochemical Pesticides Branch
Biopesticides and Pollution Prevention Division (7511C)

ACTION REQUIRED

Determine if data and information, submitted in response to our December 1, 2004 review and the associated Biopesticides and Pollution Prevention Division letter of December 15, 2004 (J. L. Andersen to D. Bujor), are adequate, in combination with that submitted originally, to 1) correct deficiencies noted in the Confidential Statements of Formula (CSFs), 2) support the request for a waiver from the requirement to conduct an acute inhalation toxicity study, and 3) support section three registration of the two subject pending products.

BACKGROUND

The two products are identical in composition and are more concentrated, granular-form, versions of currently registered end-use products containing the existing active ingredient, polyoxin D zinc salt.

The deficiencies identified by the December 1, 2004 review are as follows:

- 1) The physical/chemical characteristics are summarized in the primary review (Table 2, Page 5). The product bulk density is specified as 0.561 g/ml, while on the CSF it is given a range of 0.5 to 0.8 g/ml. The pH is specified as 7.07, while on the CSF it is given a range of pH 6 to 8. The one-year storage stability study, and the corrosion characteristics study are underway, and **need to be submitted when completed.**
- 2) The acute exposure mammalian toxicity studies were done with "Polyoxin Z dry flowable," which was described as a "Brown fine granule" containing about 11.3% Polyoxin D salt and about 88.7% surfactants, etc. which is consistent with the current product, Endorse Water Dispersible Granules. However, the test material in the toxicology studies was not further described. **Note to RAL: The registrant should confirm whether the test material used in the acute toxicity studies was the same composition as Endorse Water Dispersible Granules.**
- 3) A waiver for the acute inhalation study (no MRID assigned) was requested based on: 1) the low acute inhalation toxicity of the Polyoxin D Technical material (LC50 2.44 mg/L for males, and 2.17 mg/L for females; i.e., Toxicity Category IV) which comprises 47.5% of the product by weight, and 2) each inert ingredient has an acute oral toxicity (test animal species not noted) that would place them in Toxicity category III.

The registrant cited a single MSDS for each of the three inert ingredients. The MSD Sheets were not submitted. It was stated that animal studies with one of the inerts caused a slight decrease in lung function. But also, the registrant states acute inhalation data are not available for any of the inert ingredients.

The waiver request is not Acceptable. The acute inhalation study could be waived if particle size analysis showed that the end use product is not respirable. The rationale that low acute oral toxicity of each of the inert ingredients allows for the conclusion that the inerts would not cause or contribute to, pulmonary toxicity is not scientifically supportable.

The registrant responded in this manner:

- 1) Columns seven and eight of the February 7, 2005 CSFs (attached) have been revised to correctly state the product bulk density (0.561 g/ml) and pH (7.07) values as reported in MRID 463402-01. Per personal communication (D. Bujor to D. Greenway; February 28, 2005), "The in-life portion of the storage stability and corrosion studies were finalized on February 8th."
- 2) In a letter dated February 15, 2005 (attached), Arvesta supplied written certification that the test material used in the acute toxicity studies was of the same composition as Endorse Water Dispersible Granules.

3) A revised request for a waiver of the requirement to conduct an acute inhalation toxicity study was submitted on February 18, 2005, and assigned MRID 464485-01. At the request of the Regulatory Action Leader, D. Greenway, the agent supplied a) by e-mail on March 1, 2005, particle size information (attached), and b) by fax on March 2, 2005, a Material Safety Data Sheet (MSDS) for each of the pending products' inert ingredients (attached).

DISCUSSION/DECISION

The CSFs of February 7, 2005, revised to present the correct product bulk density and pH values, are acceptable. Upon the completion of the corrosion characteristics and one-year storage stability studies, full reports must be submitted to the Agency for review.

The February 15, 2005, certification is considered to be adequate confirmation that the test material used in the acute toxicity studies was of the same composition as Endorse Water Dispersible Granules.

Information and data contained in MRID 464485-01, even as augmented by the MSDS information, and in combination with that included in the originally submitted and reviewed acute inhalation toxicity waiver request (no MRID assigned), provide inadequate justification in support of the waiver. The potential acute toxicity of the pending end-use products has not been adequately characterized; there are not adequate inhalation toxicity results for the inerts (oral toxicity information alone is insufficient), and the acceptance of those inerts (or similarly formulated inerts) by the Agency as List 4 inerts does not imply low acute inhalation toxicity. The particle size information, as submitted, is also inadequate as support of the requested acute inhalation toxicity waiver because a) the data concern a related end-product formulation and not specifically the subject products, and b) the conditions of the analysis were not provided (e.g., was handling to produce 'fines' simulated?).

CONCLUSION

The deficiencies noted in the Confidential Statements of Formula (CSFs) have been adequately addressed. Upon the completion of the corrosion characteristics and one-year storage stability studies, full reports must be submitted to the Agency for review. The acute toxicity test material identity issue has been adequately resolved. The data and information described above, in combination with that submitted previously and reviewed on December 15, 2004, do not support the request for a waiver from the requirement to conduct an acute inhalation toxicity study. To meet the data requirement, the registrant must either conduct the study (and associated limit test), or submit scientifically sound rationale in support of a waiver request. A successful waiver justification may be developed based upon the low acute toxicity profile resulting from mammalian exposure to the pending end-use products, and a well-developed argument based on particle size (40 CFR §158.690(c), note xiv). Note that 99% of particles must exceed 100 microns in size in order for a waiver to be granted for the acute inhalation toxicity study based on non-respirable particle size.

Therefore, the data and information submitted and reviewed to date do not support section three registration of EPA File Symbols 68173-G and 66330-LA.

CONCUR

Roger Gardner
Roger Gardner, Senior Scientist

11/3/05
Date

NON-CONCUR

Roger Gardner, Senior Scientist

Date

Attachments (5)



"Bujor, Doina"
<dbujor@arvesta.com>
02/07/05 02:02 PM

To Denise Greenway/DC/USEPA/US@EPA
cc
bcc
Subject Authorization

Dear Denise,

I recognize that the letter dated February 7, 2005 from S. Reilly concerning 66330-LA and 68173-G contains confidential information. I authorize Denise Greenway to fax this document to 415-284-9884.

Best regards,

Doina

P.S. I am attaching the authorization letter I sent last week.

Doina Bujor
Project Manager/Sr. Chemist
Registration and Regulatory Affairs
Arvesta corporation
Phone: 415-778-4876
Fax: 415-284-9884



Authorization for Endorse WDG - ltr.pdf

Post-it® Fax Note 7671		Date 2/7/05	# of pages 4
To D Bujor	From D Greenway		
Co./Dept. Arvesta	Co. USEPA		
Phone # 415 778 4876	Phone # 703 308 8263		
Fax # 415 284 9884	Fax # 703 305 0918		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

FEB 07 2005

Label Review

Doina Bujor
Arvesta Corporation
100 First Street, Suite 1700
San Francisco, CA 94105

Re: Endorse® WDG (Water Dispersible Granule)
EPA File Symbols 66330-LA and 68173-G
Your Correspondence of July 21, 2004

Dear Ms. Bujor:

On the behalf of your company, Arvesta Corporation, and also as the agent for Kaken Pharmaceutical Co. Ltd., you submitted on July 21, 2004, applications, data and information intended to support the section three registration of the two cited pending products, EPA File Symbols 66330-LA and 68173-G. The Biopesticides and Pollution Prevention Division (BPPD) completed its review of the data and data waiver requests associated with these two actions, and our findings were relayed to you in our letter dated December 15, 2004. Additionally, the Pesticide Registration Improvement Act decision date for these actions was renegotiated on December 30, 2004 from February 8, 2005 to March 8, 2005. Our letter confirming the time extension was issued on January 7, 2005. This letter informs you of the results of our review of the draft labels for the two pending pesticide products. Please note that further label revision may be required, pending our review of your response to the December 15, 2004 deficiencies letter.

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is not acceptable for the reasons given below.

The following deficiencies apply to the labels of EPA File Symbols 66330-LA and 68173-G.

1) Revise the page one referral statement to read either, "See side/back panel for First Aid," or "See side/back panel for First Aid and additional precautionary statements." This will align the statement with guidance appearing in the current Label Review Manual (3rd Edition, August 2003).

SYMBOL	66330-LA	68173-G					
SURNAME	Green	Reilly					
DATE	2/7/05	2/7/05					

2) Revise the last sentence under Hazards to Humans and Domestic Animals to read, "Remove and wash contaminated clothing before reuse." This will align the statement with guidance appearing in the current *Label Review Manual* (3rd Edition, August 2003).

3) In the First Aid section, in the third "bullet" of the "If swallowed" section, insert "to do" between the words "told" and "so." This will align the statement with guidance appearing in Pesticide Registration Notice 2001-1.

4) Adopt the following updates to align the label with guidance as presented in the current *Label Review Manual* (3rd Edition, August 2003). Under Environmental Hazards, change "product" in the first sentence to "pesticide." Revise the third sentence to read, "Do not contaminate water when disposing of equipment washwater or rinsate." Insert to become the fifth sentence, "Drift and run off may be hazardous to aquatic organisms in water adjacent to treated areas."

Add as a new second paragraph, "Granules exposed on soil surface may be hazardous to fish and aquatic invertebrates. Collect granules spilled during loading."

Add as a new third paragraph, "Observe the most restrictive of the labeling limitations and precautions of all products used in mixtures."

5) The regulations (40 CFR §156.10(d)(4)) specify that the label's net weight entry is to be presented as pounds and ounces. Insert a net weight entry that complies with the regulations. Retain the existing 2.4 lbs entry parenthetically, since that value is referenced in the Rate and Schedule section discussion of the application rate.

6) In the second paragraph under General Information, insert the word "and" before "commercial."

7) Under Mixing and Application, it is strongly suggested that the last sentence of the first paragraph be modified to state the purpose, which is to assess the potential for phytotoxicity, of first testing tank mixtures on a small number of plants prior to more widespread application.

8) Revise the text of the first bullet appearing in the Mixing and Application section to become, "Fill spray tank with water to ½ of the intended final volume."

We note that these granular-form products are more concentrated versions of your/your client's existing polyoxin D zinc salt end-use products. The amount of active ingredient applied per acre for these pending products is equivalent to that specified for the existing products. However, we note that the pending products call for the application of twice the volume of finished spray, per acre, than do the existing products. This is acceptable; however, we point out the difference in the event that it is incorrect or unintended.

9) The Conditions of Sale section contains a) language that negates or detracts from required label statements, b) overly broad statements concerning limitations of liability, and c) statements purporting the buyers' agreement to assume risk. Such language and statements may be misleading and may constitute misbranding under FIFRA. Enclosed for your information and guidance in revising this section is an undated memorandum (E. C. Gray to E. L Johnson) and a Criteria and Policy Notice (Number 2163.1, revised) of February 4, 1980.

The following deficiencies apply to the label of EPA File Symbol 68173-G only.

1) References in the Conditions of Sale section to "Arvesta Corporation" and "Arvesta" are inappropriate for this Kaken Pharmaceutical Co. Ltd. (Kaken) product and so must be removed.

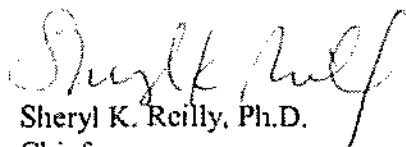
2) Absent a compelling rationale for its inclusion, the statement identifying Endorse as an Arvesta registered trademark appears inappropriately on this Kaken label, and must be deleted.

3) Because the Confidential Statement of Formula (CSF) of June 8, 2004 does not list Kaken as the producer, it is inappropriate to list Kaken under the "Produced by:" heading. Either change the heading to, for example, "Produced for," or replace Kaken's name and address on the label with those of the actual pesticide producer, as declared on the CSF.

To expedite the review of labels revised in accordance with this letter, you may fax ((703) 305-0118) them to Denise Greenway, of my staff. You still must submit such revised labels officially, and accompany them with a cover letter and a complete, signature-bearing EPA Form 8570-1.

Should you have questions or concerns regarding this letter, please contact me, or telephone Ms. Greenway on (703) 308-8263.

Sincerely,



Sheryl K. Reilly, Ph.D.

Chief

Biochemical Pesticides Branch

Biopesticides and Pollution

Prevention Division (7511C)

Enclosures (2)

DGreenway/308-8263/1-6-2005/endorselblrev.wpd.polyoxin D zinc salt

ROUTING AND TRANSMITTAL SLIP

Date

2/7/05

TO: (Name, office symbol, room number, building, Agency/Post)

1. Andy, please concur

2. Linda, please concur

3. Sheryl, please sign

4.

5.

Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	X Signature
Coordination	Justify	

REMARKS

re: non-fast track label review
 new product, old chemical
 66330-L and 68173-G

The attached letter informs the registrant/agent of the label deficiencies for each of the two labels. FYI, the agent represents both the foreign parent product and the US me-too registrant. The two products are otherwise identical. They are more concentrated, granular forms of existing polyoxin D zinc salt products. The letter often cites the new label manual in order to justify small changes found in that guidance not in place when the original products were initially registered.

Note that the due date for these was renegotiated and is now 3/8/05. A courtesy, electronic, version of the (partial) resubmission dated 1/18/05 has been received, but not the official (MRID'd) version. CSF and other issues have not been addressed.

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions.

FROM: (Name, org. symbol, Agency/Post)

Room No.-- Bldg.

(Fill in your info here)
 Denise Greenway

Phone No.

308-8263

ENDORSE® Water Dispersible Granule

GROUP	19	FUNGICIDE
-------	----	-----------

ACTIVE INGREDIENT:

Polyoxin D zinc salt 11.3%

OTHER INGREDIENTS: 88.7%

TOTAL..... 100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE SIDE/BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Causes moderate eye irritation. Harmful if absorbed through the skin, swallowed or inhaled. Avoid contact with skin, eyes or clothing. Avoid breathing dust or spray mist. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID	
If on skin or clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
If swallowed	<ul style="list-style-type: none"> • Call poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE: CALL 1-800-228-5635 Ext. 174	

ENVIRONMENTAL HAZARDS

This product is moderately toxic to aquatic invertebrates and fish. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment wash waters. Do not allow runoff into lakes, streams, ponds or public waterways.

EPA Reg. No. 66330-_____
EPA EST. No. _____
Net weight 2.4 lbs

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

GENERAL INFORMATION

ENDORSE Water Dispersible Granule is NOT for use on turf being grown (1) for sale or other commercial use as sod, (2) for commercial seed production, or (3) for research purposes.

ENDORSE Water Dispersible Granule is for use on golf courses, residential lawns, parks, commercial and institutional grounds composed of cool and warm season grasses such as Bluegrass, Bentgrass, Fescue, Ryegrass, Zoysiagrass, or their mixtures.

ENDORSE Water Dispersible Granule is a systemic, foliar applied turf fungicide for control of **Brown Patch** and **Large Patch** caused by *Rhizoctonia* spp. ENDORSE Water Dispersible Granule also controls **Cool Weather Brown Patch (Yellow Patch)** (*Rhizoctonia cerealis*), **Foliar and Basal Anthracnose** (*Colletotrichum graminicola*), **Gray Snow Mold** (*Typhula ishikariensis* and *Typhula incarnata*), **Leaf Spot/Melting Out** (*Dreschlera poae*), **Pink Snow Mold** (*Microdochium nivale*), **Red Thread** (*Laetisaria fuciformis*), **Rhizoctonia Damping Off** (*Rhizoctonia solani*), and **Zoysia Patch** (*Rhizoctonia solani*) on cool and warm season turf grasses.

ENDORSE Water Dispersible Granule also aids in the suppression of **Gray Leaf Spot** (*Pyricularia grisea*).

Apply ENDORSE Water Dispersible Granule as a preventive or curative treatment in conjunction with good turf management practices.

RESISTANCE MANAGEMENT RECOMMENDATIONS

ENDORSE Water Dispersible Granule contains a Group 19 fungicide. Fungal isolates with acquired resistance to Group 19 may eventually dominate the fungal population if Group 19 fungicides are used repeatedly in the same field or in successive years as the primary method of control for targeted species. This may result in partial or total loss of control of those species by ENDORSE Water Dispersible Granule or other Group 19 Fungicides.

To delay fungicide resistance, consider:

- Avoiding the consecutive use of ENDORSE Water Dispersible Granule or other target site of action Group 19 fungicides that have a similar target site of action, on the same pathogens.
- Using tank-mixtures or premixes with fungicides from different target site of action Groups as long as the involved products are all registered for the same use and are both effective at the tank mix or prepack rate on the pathogen(s) of concern.
- Basing fungicide use on a comprehensive IPM program.
- Monitoring treated fungal populations for loss of field efficacy.
- Contacting your local extension specialist, certified crop advisors, and/or manufacturer for fungicide resistance management and/or IPM recommendations for specific crops and resistant pathogens.

MIXING AND APPLICATION

When diseases not specified on this label, such as Dollar Spot, are present or expected, it is appropriate to mix ENDORSE Water Dispersible Granule with appropriately labeled fungicides. When tank mixing ENDORSE Water Dispersible Granule with other products, observe all precautions and limitations on each separate product label. It is always advisable to conduct a tank mix compatibility test when you plan to mix this product with other products. To determine the physical compatibility of this product with other products, use a jar test. Using a quart jar, add the proportionate amounts of the products to approximately one quart of water with agitation. Add dry formulations first, then flowables, then emulsifiable concentrates last. After thorough mixing, allow this mixture to stand for 5 minutes. If the combination remains mixed or can be readily remixed, it is physically compatible. Once compatibility has been proven, use the same procedure for adding required ingredients to the spray tank. Use combinations on a small number of plants before treating large areas.

Do not apply this product through any type of irrigation system.

Mixing instructions for ENDORSE Water Dispersible Granule:

- Fill spray tank to $\frac{1}{2}$ of the intended final volume.
- Start spray tank agitation.
- Add the appropriate amount of product to the tank (refer to Rate and Schedule section of label). Follow the directions above for mixing other products in the spray tank.
- Agitate to ensure thorough mixing while adding the remaining required water.
- DO NOT allow the spray mixture to stand without agitation.

Mix only the amount of spray solution needed to treat the desired area.

For optimum control of labeled diseases, apply ENDORSE Water Dispersible Granule with sufficient water to provide a thorough coverage.

Irrigation or rainfall soon after treatment with ENDORSE Water Dispersible Granule will decrease disease control. For best control, do not irrigate for 12 hours after treatment.

For best results, apply after mowing.

RATE AND SCHEDULE

Apply 2.4 lbs (1 bag) of ENDORSE Water Dispersible Granule per acre (0.27 lbs active ingredient/acre) in a minimum of 88 gallons of water per acre.

Repeat treatment on a 7-14 day schedule as necessary when environmental conditions are conducive to development of disease. When disease symptoms are present, best control will be achieved by using a shorter interval.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store in dry place away from food or feed.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed, by State and local authorities, by burning. If burned, stay out of smoke.

**FOR 24-HOUR CHEMICAL EMERGENCY
(Spill, Leak, Fire or Accident) ASSISTANCE:
CALL CHEMTREC 1-800-424-9300**

CONDITIONS OF SALE

1. Arvesta Corporation warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in accordance with the Directions for Use under normal conditions of use.
2. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Arvesta. **ARVESTA DISCLAIMS ALL OTHER WARRANTIES, EXPRESSED OR IMPLIED, INCLUDING ANY WARRANTY OF FITNESS OR MERCHANTABILITY. SELLER SHALL NOT BE LIABLE FOR CONSEQUENTIAL SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. TO THE EXTENT PERMITTED BY LAW, SELLER'S LIABILITY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE. ARVESTA DOES NOT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTY, GUARANTEE OR REPRESENTATION CONCERNING THIS PRODUCT.**
3. Critical and unforeseeable factors beyond Arvesta's control prevent Arvesta from eliminating all risks in connection with the use of this product. Such risks include, but are not limited to, damage to plants and crops to which the product is applied, lack of complete control, and damage caused by drift to other plants or crops. Such risks occur even though the product is reasonably fit for the use stated on the label and even though label directions are followed. Except as stated in 1 above, Buyer and User acknowledge and assume all risks and liabilities resulting from handling, storage, and use of this product.

ENDORSE® is a registered trademark of Arvesta Corporation.

Produced for:
Arvesta Corporation
100 First Street, Suite 1700
San Francisco, CA 94105

Registration Details

Company: **66330 ARVESTA CORPORATION**

Risk Mgr: **RM 91** **Biologicals & Pollution Prevention Division, PM Team 91**

Organization: **EPPO / BPG**

Current Status: **Under Review (22-JUL-2004)**

Reg. Number: **66330-LA** Pesticide Type: **Biochemical** High Exposure? ☐

Use Type: **EP** Signal Word: **Caution**

Repack: ☐ Yes ☐ No

NPIC Phone: ☐ Yes ☐ No

WPS Written Notification: ☐ Yes ☐ No

Related Products

☒ Use Patterns ☒ Transfer History ☒ Toxicology ☒ Mode Of Action ☒ ER Notice ☒ Receipts

☒ Product Name ☒ Ingredient ☒ Formulation Property ☒ Pesticide Category ☒ Permitted State

Product Name	Name Status
ENDORSE WATER DISPERSIBLE GRAHULES	Active

Tracking

Status

Site/Route

CSF

Data Requirements

Generate Reports

Print Ingredients

2-Submissions Included

FEB 08 2005 BPPD

S774975

FYI

350 (← unable to use action code.)

Denise Greenway file

Authorized Agent

Mod 2/25/2005

try to do

info reply necessary

✓ done 3/1/05

AIO
FEB 25 2005

solh
141



Arvesta Corporation
100 First Street, Suite 1700
San Francisco, CA 94105
Tel: (415) 536-3450
Fax: (415) 284-9883
www.arvesta.com

February 3, 2005

Denise Greenway
Product Manager
Biopesticide and Pollution Prevention Division (7511C)
Environmental Protection Agency
1801 Bell Street
Arlington, Va. 22202

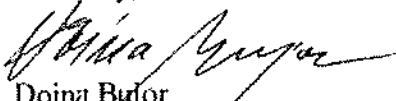
Re: Authorization for Endorse WDG

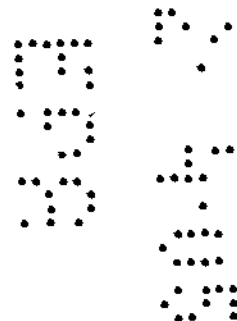
Dear Ms. Greenway:

Arvesta Corporation located at 100 First Street, Suite 1700, San Francisco, California 94105, EPA company number 66330, is authorizing Dr. Robert Stewart from Technology Science Group Inc. to represent Arvesta in the matters relating to Endorse WDG, EPA Reg. No. ~~66330-LA~~ and ~~68173-G~~.

Please direct any questions and correspondence to me at e-mail: dbujor@arvesta.com
phone: 415-778-4876 or fax: 415-284-9884.

Sincerely,


Doina Bujor
Project Manager, R&RA
Arvesta Corporation



United States Environmental Protection Agency

Post-It* Fax Note	7671	Date	1/7/05	# of pages	1
To	D Bujor	From	D Greenway		
Co./Dept.	Avesta	Co.	USEPA		
Phone #	415 778 4876	Phone #	703 308 8263		
Fax #	415 284 4884	Fax #	703 305 0118		

Policy Action Review

JAN 07 2005

Doina Bujor
Avesta Corporation
100 First Street, Suite 1700
San Francisco, CA 94105

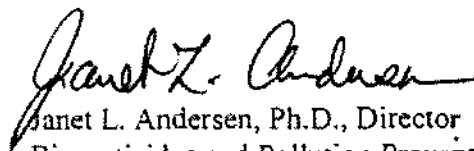
Re: Renegotiation of Decision Time Review Period
Endorse® WDG (Water Dispersible Granule)
EPA File Symbols ~~66330-LA~~ and 68173-G
Decision Numbers 346783 and 346781

Dear Ms. Bujor:

The purpose of this letter is to confirm the agreement between the Agency, your client, and your company to extend the decision time review period for the above-referenced actions. In your December 30, 2004 telephone call with Denise Greenway, of my staff, you agreed to extend the decision time review period for these actions for an additional 30 days. As a result, the decision time review period has now been extended until March 8, 2005.

If you have any questions or comments, please contact Ms. Greenway either by phone ((703) 308-8263) or e-mail (greenway.denise@epa.gov).

Sincerely yours,



Janet L. Andersen, Ph.D., Director
Biopesticides and Pollution Prevention Division (7511C)

DGreenway/308-8263/1-3-2005/endorsePRIArenego.wpd/polyoxin D zinc salts

CONCURRENCES							
SYMBOL ▶	7511C						
SURNAME ▶	Greenway						
DATE ▶	1/3/2005						

ROUTING & TRANSMITTAL SLIP

January 3, 2005

TO: (Name, office symbol, room number, building,
Agency/Post)

Initials

Date

1. J. Andersen, please sign

JCA

1/7/05

2.

3.

4.

5.

Action	File	Note And Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	Initials, Concurrence

MARKS

re: PRIA date renegotiation confirmation letter
66330-LA and 68173-G

Last Thursday, approval was received to extend by 30 days the 2/8/05 PRIA due date associated with the two cited actions. The new date was requested by the registrant/agent, who desired additional time to respond to the deficiencies letter of 12/15/04.

Thank you for your attention to this document. Please see me should there be concerns.

FROM: (Name, org. symbol, Agency/Post)

Room No.-Bldg.

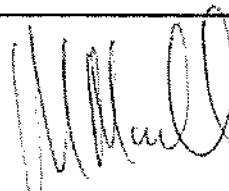
Denise

Denise

Phone No.

308-8263

Recommendation to Division Directors On Negotiated Due Dates and Denials			
Reg#: 66330-LA	Action: B67	PRIA Mandated Time frame: 2/8/05	
Submitted by: Denise Greenway		Branch: BPB/BPPD	Date: 12/30/04
Company: Arvesta Corp			
Current Due Date: 2/8/05			
Issue (describe in detail): Company needs time to get information from Japan to answer deficiencies and has requested 30 extra days.			
Recommendation (include proposed new due date for renegotiations): 3/8/05			
Rationale: Japan folks are on holiday and cannot be reached			
History			
Original Due Date: 2/8/05			
Has due date been renegotiated before: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO			
If Yes Provide Complete History:			
Describe Interactions With Company (describe in detail): Company has told us they need an extra 30 days.			
Other Comments:			

OK  12-30-04



Denise
Greenway/DC/USEPA/US
12/21/04 10:18 AM

To Mike Mendelsohn/DC/USEPA/US@EPA
cc
bcc
Subject Re: electronic review for IHAD, etc. [icon]

Mike,

To my knowledge, the DER hard copies and electronic versions match. Dr. Roy Sjoblad was the BPPD secondary reviewer, and he signed all DERs, and dated them all December 1, 2004, which is the same date as his memo.

Thank you for offering to add Roy's name and date electronically to the DERs/memo I sent you earlier.

Also - paper copies of DERs were placed in box & shipped to Roy? 12/1/04 memo

Denise
Mike Mendelsohn/DC/USEPA/US



Mike
Mendelsohn/DC/USEPA/US
12/21/04 09:50 AM

To Denise Greenway/DC/USEPA/US@EPA
cc
Subject Re: electronic review for IHAD, etc. [icon]

Denise,

Could you verify that the electronic version matches the hard copy and insert the dates into the DERs and secondary review? Also, did Roy not sign the DERs? There is a space for secondary reviewer, but no name or date. Thanks.

Mike

Denise Greenway/DC/USEPA/US



Denise
Greenway/DC/USEPA/US
12/17/2004 10:43 AM

To Mike Mendelsohn/DC/USEPA/US@EPA
cc Roy Sjoblad/DC/USEPA/US@EPA
Subject electronic review for IHAD, etc.

[attachment "46340202.der.wpd" deleted by Mike Mendelsohn/DC/USEPA/US] [attachment "46340203.der.wpd" deleted by Mike Mendelsohn/DC/USEPA/US] [attachment "46340204.der.wpd" deleted by Mike Mendelsohn/DC/USEPA/US] [attachment "46340205.der.wpd" deleted by Mike Mendelsohn/DC/USEPA/US] [attachment "46340206.der.wpd" deleted by Mike Mendelsohn/DC/USEPA/US] [attachment "secondary review.wpd" deleted by Mike Mendelsohn/DC/USEPA/US] [attachment "Waiver_inhalation.der.wpd" deleted by Mike Mendelsohn/DC/USEPA/US] [attachment "46340201.der.wpd" deleted by Mike Mendelsohn/DC/USEPA/US]

Mike,

Roy's secondary review memo is dated 12/1/04. It's not in the chron file. The tox DERs were dated 11/17/04 and the chemistry DER (MRID 46340201) was dated 11/03/04. I believe these files to contain CBI, and will send them "encrypted." Per my understanding of the 12/02/04 instructions from Sheryl, I will place just the secondary review, without DERs, in the new box in the file room. Please let me know if that is the correct procedure.









Thanks for your help!

Denise
30808263



Denise
Greenway/DC/USEPA/US
12/17/04 10:29 AM

To: mike mendelsohn
cc: Roy Sjoblad/DC/USEPA/US
bcc:
Subject: electronic review for IHAD, etc.

     
46340202.der.wpd 46340203.der.wpd 46340204.der.wpd 46340205.der.wpd 46340206.der.wpd secondary review.wpd
 
Waiver_inhalation.der.wpd 46340201.der.wpd

Mike,

Roy's secondary review memo is dated 12/1/04. It's not in the chron file. The tox DERs were dated 11/17/04 and the chemistry DER (MRID 46340201) was dated 11/03/04. I believe these files to contain CBI, and will send them "encrypted." Per my understanding of the 12/02/04 instructions from Sheryl, I will place just the secondary review, without DERs, in the new box in the file room. Please let me know if that is the correct procedure.

Thanks for your help!

Denise
30808263

Dear Denise,

I received the fax. Thank you.

Regards,

Doina

-----Original Message-----

From: Greenway.Denise@epamail.epa.gov
(mailto:Greenway.Denise@epamail.epa.gov)
Sent: Wednesday, December 15, 2004 10:57 AM
To: Bujor, Doina
Subject: Re: Polyoxin

Dear Doina,

It has been sent, less the enclosure which will accompany the signature-bearing copy by regular mail. Please alert me to any trouble with the fax transmission. Thank you!

Regards,

Denise

"Bujor, Doina"
<dbujor@arvesta.com>

12/15/04 01:51
PM

Denise Greenway/DC/USEPA/US@EPA

To
cc

Polyoxin

Subject

Note: Enclosure to follow in regular mail w/original

Post-It® Fax Note	7671	Date	12/15/04	# of pages	4
To	Doina Bujor	From	DGreenway		
Co./Dept.	Arvesta	Co.	USEPA		
Phone #	415 778 4876	Phone #	703 308 8263		
Fax #	415 284 9884	Fax #	703 305 0118		

Dear Denise,

I agree to receive the Endorse WDG data review document dated 12-15-2004 by fax and I am aware that contains CBI. My fax number is 415-284-9884. Thank you,

Best regards,

Doina

Doina Bujor
Project Manager/Sr. Chemist
Registration and Regulatory Affairs
Arvesta corporation
Phone: 415-778-4876
Fax: 415-284-9884

12/17/04

This documents that our
12/15/04 letter was rec'd

on 12/15/04. Start 15-day
time allotment for response

(with data, etc or request to rene-
sitate). It is

12/30/04

D. Greenway
BPPD

703 308 8263



"Bujor, Doina"
<dbujor@arvesta.com>
12/15/04 02:37 PM

To: Denise Greenway/DC/USEPA/US@EPA
cc
bcc
Subject: RE: Polyoxin

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DEC 15 2004

DEC 15 2004

Doina Bujor
Arvesta Corporation
100 First Street, Suite 1700
San Francisco, CA 94105

Re: Endorse® WDG (Water Dispersible Granule)
EPA File Symbols 66330-LA and 68173-G
Your Correspondence of July 21, 2004

8765724	667
8765723	
DP 308555	11
DP 308553	
DP 308554	
DP 308552	

Dear Ms. Bujor:

On the behalf of your company, Arvesta Corporation, and also as the agent for Kaken Pharmaceuticals, you submitted on July 21, 2004, applications, data and information intended to support the section three registration of the two cited pending products, EPA File Symbols 66330-LA and 68173-G. The Biopesticides and Pollution Prevention Division (BPPD) has completed its review of the data and data waiver requests associated with these two actions (see the enclosed memorandum, R. D. Sjoblad to D. Greenway, December 1, 2004). Our findings are presented below.

CHEMISTRY

Product Chemistry, MRID 463402-01

We note that the Confidential Statements of Formula (CSFs) for each product present a range of values for the product bulk density and pH entries. Ranges of values are not acceptable as CSF entries for these physical and chemical characteristics. Correct this deficiency by revising the CSFs to reflect the product bulk density and pH values as reported in the subject study.

We note also that the one-year storage stability study and the corrosion characteristics study are both underway. These two required studies must be submitted upon their completion.

CONCURRENCES							
SYMBOL	7511C	7511C					
SURNAME	Greenway	Russ					151
DATE	12/6/2004	12/13/04					

MAMMALIAN TOXICOLOGY

Although the test material with which the following studies were conducted ("Polyoxin Z dry flowable") was described as a "Brown fine granule" comprised of about 11.3% Polyoxin D Salt and about 88.7% surfactants, which is consistent with the pending end-use products, you must provide written certification of whether the test material used in the acute toxicity studies was of the same composition as Endorse Water Dispersible Granule.

Acute Oral Toxicity (rat), MRID 463402-02

Acceptable. Toxicity Category III.

Acute Dermal Toxicity (rat), MRID 463402-03

Acceptable. Toxicity Category III.

Primary Eye Irritation (rabbit), MRID 463402-04

Acceptable. Toxicity Category III.

Primary Dermal Irritation (rabbit), MRID 463402-05

Acceptable. Toxicity Category IV.

Skin Sensitization (guinea pig), MRID 463402-06

Acceptable. Not a sensitizer.

Acute Inhalation Toxicity Data Waiver Request, no MRID

The rationale offered as justification for the waiver of this required study was determined by BPPD to be inadequate. You therefore must address this data gap by either a) the submission of data adequate to meet the study guideline requirements, b) the citation of publicly available literature, data or other information adequate to satisfy the study guideline requirements, or c) the submission of a data waiver request amended to present a scientifically valid rationale for granting a waiver of the study requirement. See 40 CFR § 158.690(c), note xiv and the enclosed memorandum (R. D. Sjoblad to D. Greenway, December 1, 2004).

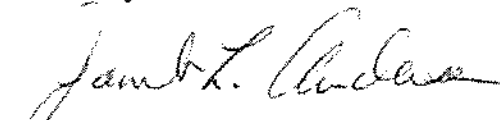
Please note that the review of the proposed labels for EPA File Symbols 66330-LA and 68173-G is pending. Those label reviews, as well as our review of any resubmission intended to resolve the existing deficiencies, as identified and described above, will be made available to you in a subsequent letter(s).

In any resubmission, please also address and reconcile these product name inconsistencies. For example, we note that "Endorse Water Dispersible Granule (WDG)" appears on the data matrices, "Endorse WDG" appears on the CSFs and your correspondence, and "Endorse® Water Dispersible Granule" appears on the draft labels. Make clear a single primary brand name for these pending products.

Your action category B67 Pesticide Registration Improvement Act (PRIA) applications are guaranteed a six month schedule for completion. Should you need more than 15 days from the date of your receipt of this letter to address the deficiencies identified above, the Agency would like to use this opportunity to renegotiate your PRIA due date of February 8, 2005. Please promptly contact Denise Greenway, at greenway.denise@epa.gov, with your response.

Should you have questions or concerns regarding this letter, please contact me, or telephone Ms. Greenway on (703) 308-8263.

Sincerely,



Janet L. Andersen, Ph.D.
Director
Biopesticides and Pollution
Prevention Division (7511C)

Enclosure

DGreenway/308-8263/12-15-2004/endorscdefltr.wpd.polyoxin D zinc salts

ROUTING & TRANSMITTAL SLIP

December 6, 2004

TO: (Name, office symbol, room number, building, Agency/Post)

Initials

Date

1. R. Sjoblad, please comment/concur

2. L. Hollis, do.

3. S. Reilly, do.

4. I. Andersen, please sign

5.

Action	File	Note And Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	Initials, Concurrence

REMARKS

re: 66330-LA and 68173-G
Non-fast track, PRIA due date is 2/8/2005
Deficiencies exist

This letter alerts the agent/registrant to deficiencies identified in the data/data waiver requests submitted in support of the cited pending products. One data set supports both.

FROM: (Name, org. symbol, Agency/Post)

Room No.-Bldg.

Denise Greenway

308-8263

Phone No

Sheryl's comments / Q's -
Do we need
PRIA renegotiation of
due date language?

Storage still / correction
can be
basis of Conditional
Registers (?)

May want to
suggest in letter
that they contact
Denise for assistance
with waiver language
she could have
televised w/ res.
+ have them
help them -

Janet / Henry

4H
12/8

(1) Perhaps greater than 10 days for resubmission
of requested info. shld. be allotted

(2) ~~used~~ The Reviewer has that the storage
ability; conversion of analog to digital and ~~modifying~~
and that they must be completed & submitted
don't know how far the company is in its present
stage, but again may need to allow more
time, since what we are asking will not take a
substantial amount of time to review it

DATA PACKAGE BEAN SHEET

Date: 23-Sep-2004

Page 1 of 3

*** Registration Information ***

Registration: 66330-LA - ENDORSE WATER DISPERSIBLE GRANULES

Company: 66330 - ARVESTA CORPORATION

Risk Manager: RM 91 - Sheryl Reilly - (703) 308-8269 Room# CM-2 910D

Risk Manager Reviewer: Denise Greenway DGREENWA

Sent Date: 12-Aug-2004

Calculated Due Date: 28-Feb-2005

Edited Due Date: _____

Type of Registration: Product Registration - Section 3

Action Desc: (B67) NEW PRODUCT;NON-FAST TRACK;MICROBIAL/BIOCHEMICAL;

Ingredients: 230000, .beta.-D-Allofuranuronic acid, 5-((2-amino-5-O-(aminocarbonyl)-2-deoxy-L-xylofuryl)am

*** Data Package Information ***

Expedite: ☐ Yes ☒ No

Date Sent: 23-Sep-2004

Due Back: _____

DP Ingredient: _____

DP Title: _____

CSF Included: ☒ Yes ☐ NoLabel Included: ☒ Yes ☐ No

Parent DP #: _____

Assigned To

Date In

Date Out

Organization: BPPD / BPB

Administrative Due Date: 22-Mar-2005

Team Name: _____

Negotiated Due Date: _____

Reviewer Name: _____

Projected Completion Date: _____

Contractor Name: _____

*** Studies Sent for Review ***

Printed on Page 2

*** Additional Data Package for this Decision ***

Printed on Page 3

*** Data Package Instructions ***

ORNL: Submitted for primary review are ACUTE TOX "six-pack" data and a data waiver volume to support this new product containing an existing ai. These data and waiver request also are intended to support a second pending product, 68173-G (see related bean sheet). The BPPD screen results are attached, as well as incoming correspondence of 7/21/04, CSF of 6/8/04, label pinpunched 7/22/04, data matrix of 7/21/04, MRIDs 463402-02 thru -06, and admin. vol. 4 of 7 (acute inhal tox waiver request). Please direct any concerns to the RAL (D. Greenway, 703 308-8263)

DP#: (308553)

*** Studies Sent for Review ***

Decision#: (346783)

MRID	Citation Reference	Guideline
46340202	Oda, S. (1996) An Oral Acute Toxicity Study of Polyoxin Z Dry Flowable In Rats: (Endorse Water Dispersible Granules). Project Number: BOZO/B/3301. Unpublished study prepared by Bozo Research Center, Inc. 28 p.	870.1100/Acute oral toxicity
46340203	Oda, S. (1996) A Dermal Acute Toxicity Study of Polyoxin Z Dry Flowable In Rats: (Endorse Water Dispersible Granules). Project Number: BOZO/B/3302. Unpublished study prepared by Bozo Research Center, Inc. 24 p.	870.1200/Acute dermal toxicity
46340204	Shibata, R. (1996) A Primary Eye Irritation Study of Polyoxin Z Dry Flowable In Rabbits. Project Number: BOZO/B/3304. Unpublished study prepared by Bozo Research Center, Inc. 37 p.	870.2400/Acute eye irritation
46340205	Shibata, R. (1996) A Primary Dermal Irritation Study of Polyoxin Z Dry Flowable in Rabbits. Project Number: BOZO/B/3305. Unpublished study prepared by Bozo Research Center, Inc. 30 p.	870.2500/Acute dermal irritation
46340206	Shibata, R. (1996) A Skin Sensitization Study of Polyoxin Z Dry Flowable In Guinea Pigs. Project Number: BOZO/B/3306. Unpublished study prepared by Bozo Research Center, Inc. 46 p.	870.2600/Skin sensitization

DP#: (308553)

*** Additional Data Package for this Decision ***

Decision#: (346783)

DP #	Division/branch	Date Sent	Date Due	Instructions?	CSP	Tabbi
308515	BPPD / BPB	23-Sep-2004	22-Mar-2005	<input type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> No
308515	BPPD / BPB	23-Sep-2004	22-Mar-2005	<input type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> No

DATA PACKAGE BEAN SHEET

Date: 23-Sep-2004

Page 1 of 2

***** Registration Information *****

Registration: 66330-LA - ENDORSE WATER DISPERSIBLE GRANULES

Company: 66330 - ARVESTA CORPORATION

Risk Manager: RM 91 - Sheryl Reilly - (703) 308-8269 Room# CM-2 910D

Risk Manager Reviewer: Denise Greenway DGREENWA

Sent Date: 12-Aug-2004

Calculated Due Date: 28-Feb-2005

Edited Due Date: _____

Type of Registration: Product Registration - Section 3

Action Desc: (B67) NEW PRODUCT;NON-FAST TRACK;MICROBIAL/BIOCHEMICAL;

Ingredients: 230000, .beta.-D-Allofuranuronic acid, 5-((2-amino-5-O-(aminocarbonyl)-2-deoxy-L-xylofuroyl)am

***** Data Package Information *****Expedite: ☐ Yes ☒ No

Date Sent: 23-Sep-2004

Due Back: _____

DP Ingredient: _____

DP Title: _____

CSF Included: ☒ Yes ☐ NoLabel Included: ☒ Yes ☐ No

Parent DP #: _____

Assigned To**Date In****Date Out**

Organization: BPPD / BPB

Administrative Due Date: 22-Mar-2005

Team Name: _____

Negotiated Due Date: _____

Reviewer Name: _____

Projected Completion Date: _____

Contractor Name: _____

***** Studies Sent for Review *****

Printed on Page 2

***** Additional Data Package for this Decision *****

No Additional Data Packages

***** Data Package Instructions *****

ORNL: Submitted for primary review are CHEMISTRY data to support this new product containing an existing ai. The data also are intended to support a second pending product, 68173-G (see related bean sheet). The BPPD screen results are attached, as well as incoming correspondence of 7/21/04, CSF of 6/8/04, label pinpunched 7/22/04, data matrix of 7/21/04, and MRID 46340201. Please contact the RAL (D. Greenway, 703 308-8263) with any concerns. Thank you!

PR14
delp
2/8/05

DP#: (308515)

*** Studies Sent for Review ***

Decision#: (346783)

MRID	Citation Reference	Guideline
46340201	Cornes, S.; Yi, Y.; Baldwin, K. (2004) U.S. EPA Product Properties Test Guidelines - Group A and B of Endorse WDG (TM-43802). Project Number: TMN/0213, TMN/0214. Unpublished study prepared by Toxikon Corp., Arvesta Corporation and TNO Prins Maurits Laboratory. 57 p.	830.1550/Product Identity and cor
46340201	Cornes, S.; Yi, Y.; Baldwin, K. (2004) U.S. EPA Product Properties Test Guidelines - Group A and B of Endorse WDG (TM-43802). Project Number: TMN/0213, TMN/0214. Unpublished study prepared by Toxikon Corp., Arvesta Corporation and TNO Prins Maurits Laboratory. 57 p.	830.1600/Description of materials
46340201	Cornes, S.; Yi, Y.; Baldwin, K. (2004) U.S. EPA Product Properties Test Guidelines - Group A and B of Endorse WDG (TM-43802). Project Number: TMN/0213, TMN/0214. Unpublished study prepared by Toxikon Corp., Arvesta Corporation and TNO Prins Maurits Laboratory. 57 p.	830.1620/Description of productio
46340201	Cornes, S.; Yi, Y.; Baldwin, K. (2004) U.S. EPA Product Properties Test Guidelines - Group A and B of Endorse WDG (TM-43802). Project Number: TMN/0213, TMN/0214. Unpublished study prepared by Toxikon Corp., Arvesta Corporation and TNO Prins Maurits Laboratory. 57 p.	830.1650/Description of formulatio
46340201	Cornes, S.; Yi, Y.; Baldwin, K. (2004) U.S. EPA Product Properties Test Guidelines - Group A and B of Endorse WDG (TM-43802). Project Number: TMN/0213, TMN/0214. Unpublished study prepared by Toxikon Corp., Arvesta Corporation and TNO Prins Maurits Laboratory. 57 p.	830.1670/Discussion of formation
46340201	Cornes, S.; Yi, Y.; Baldwin, K. (2004) U.S. EPA Product Properties Test Guidelines - Group A and B of Endorse WDG (TM-43802). Project Number: TMN/0213, TMN/0214. Unpublished study prepared by Toxikon Corp., Arvesta Corporation and TNO Prins Maurits Laboratory. 57 p.	830.1700/Preliminary analysis
46340201	Cornes, S.; Yi, Y.; Baldwin, K. (2004) U.S. EPA Product Properties Test Guidelines - Group A and B of Endorse WDG (TM-43802). Project Number: TMN/0213, TMN/0214. Unpublished study prepared by Toxikon Corp., Arvesta Corporation and TNO Prins Maurits Laboratory. 57 p.	830.1750/Certified limits
46340201	Cornes, S.; Yi, Y.; Baldwin, K. (2004) U.S. EPA Product Properties Test Guidelines - Group A and B of Endorse WDG (TM-43802). Project Number: TMN/0213, TMN/0214. Unpublished study prepared by Toxikon Corp., Arvesta Corporation and TNO Prins Maurits Laboratory. 57 p.	830.1800/Enforcement analytical

Receipt for Section 3				[X]	
S: 764593					
Regulatory Type:	Product Registration - Section 3	Resubmission:	<input type="radio"/> Yes <input checked="" type="radio"/> No	<div>Print Letter</div> <div>Enter More Information</div>	
Application Type:	New Registration	Fee For Service:	<input checked="" type="radio"/> Yes <input type="radio"/> No		
Company:	55330 ARVESTA CORPORATION	V			
Risk Manager:	Biologicals & Pollution Prevention Division, PM Team 91				
Product #:	55330-LA	Product Name:	ENDORSE WATER DISPERSIBLE GRANULES		
Chemical:					
Me Too Section:		Me Too Product Name:			
Application Date:	21-Jul-2004	OPP Rec'd Date:	22-Jul-2004	<div>Receipt Content</div> <div>Study</div>	
Front End Date:	22-Jul-2004	Risk Manager Send Date:	27-Jul-2004		
Fast Track:	<input type="checkbox"/>	New Ingredient:	<input type="checkbox"/>		
Receipt Description:					
Form A:	<input type="checkbox"/>	Signature Date:		Form B:	<input type="checkbox"/>

Data Screen Comment Form for Active Ingredients [beta-D-Allofuranuronic acid, s-(2-amino-5-o-(aminocarbonyl)-2-deoxy-L-xylor/Polyoxin-D zinc salt); PC No:230000]

Product Name [Endorse-WDG; EPA File Symbol No.66330-LA2]

Date [9/21/2004]

RAL [Andy Bryceland]
Screener [Nasrin Begum]

Circle One: PASS- conditional

THIS FORM DOES NOT CONTAIN CONFIDENTIAL BUSINESS INFORMATION

Product Chemistry

1. Product chemistry data submitted in this package appears to be adequate.
2. CSF and Label seems to be complete.

Toxicity

1. Acute Toxicity data requirement is addressed by submitted studies appears to be adequate; waiver request for inhalation toxicity study seems to be justified.
2. GLP statements and Data Confidentiality Claims pages are sent with this submission (previously identified deficiencies by the agency). Signature was done by Project Manager not by study director.

Non-target Organisms/ Environmental Fate

1. Not present.

Product Performance (Efficacy)

1. Not present.

Residue

1. Not present. Not applicable.

Comments/Recommendations:

It is a re-submission..

Data Screen Comment Form for Active Ingredients [beta-D-Allofuranuronic acid, s-(2-amino-5-o-
(aminocarbonyl)-2-deoxy-L-xylo)/Polyoxin-D zinc salt]; PC No:230000]

Product Name [Endorse-WDG; EPA File Symbol No.66330-LA]

Date [9/3/2004]

RAL [Andy Bryceland]
Screener [Nasrin Begum]

Circle One: PASS

THIS FORM DOES NOT CONTAIN CONFIDENTIAL BUSINESS INFORMATION

Product Chemistry

1. Product chemistry data submitted in this package appears to be adequate.
2. CSF and Label seems to be complete.

Toxicity

1. Acute Toxicity data requirement is addressed by submitted studies appears to be adequate; waiver request for inhalation toxicity study seems to be justified.

Non-target Organisms/ Environmental Fate

1. Not present.

Product Performance (Efficacy)

1. Not present.

Residue

1. Not present. Not applicable.

Comments/Recommendations:

It is an end use product.

Date: 9/9/04

Checklist for Data Packages/Administrative Material (EPA Reg. No. 66330-LA)
(Active ingredient name: beta-D-Allofuranuronic acid, 5-(2-amino-5-o-(aminocarbonyl)-2-deoxy-L-xylor/Polyoxin-D zinc salt)

Division RAL for this package: Andy Bryceland

Passed: Screen: Nasrin Begum

Admin Materials	Signed		Date	Absent	Comments
	Yes	No			
Form 8570-1	X		7/21/04		68173-1
CSF - Completely filled out & original signature (EPA Form 8570-4)	X		6/8/04		
Method of Support	X		7/21/04		Selective method
Label				X	NA
Physical address of manufacturer on label	X				Present at the last page instead of front page
Data Matrix - Two/one for jacket; one for FOIA (EPA Form 8570-35)	X		7/21/04		
Formulator's exemption form (EPA Form 8570-27)					
Transmittal letters	X		7/28/04		
Petition/amended petition if food tolerance or exemption/amended food tolerance or exemption					
ER template if food tolerance or exemption/amended food tolerance or exemption					
Certification with Respect to Citation of Data Form (EPA Form 8570-34) - if required	X		7/21/04		
Minutes on data requirements (pre-registration meeting)					
Active ingredient # (i.e. Chemical PC code)					PC Code: 230000
Jacket from EPA Identifying Symbol					66330-LA
Are MRIDS assigned? (State Yes/No in comments)					Yes
Background Experimental Use Permit information, if applicable				X	NA

Additional Comments:

Data Screen Comment Form for Active Ingredients (beta-D-Allofuranuronic acid, s-(2-amino-5-o-aminocarbonyl)-2-deoxy-L-xylor/Polyoxin-D zinc salt); PC No:230000]

Product Name [Endorse-WDG; EPA File Symbol No.66330-LA]

Date [9/3/2004]

RAL [Andy Bryceland]
Screener [Nasrin Begum]

Circle One: PASS

THIS FORM DOES NOT CONTAIN CONFIDENTIAL BUSINESS INFORMATION

Product Chemistry

1. Product chemistry data submitted in this package appears to be adequate.
2. CSF and Label seems to be complete.

Toxicity

1. Acute Toxicity data requirement is addressed by submitted studies appears to be adequate; waiver request for inhalation toxicity study seems to be justified.

Non-target Organisms/ Environmental Fate

1. Not present.

Product Performance (Efficacy)

1. Not present.

Residue

1. Not present. Not applicable.

Comments/Recommendations:

It is an end use product.

Date: 9/3/04

Checklist for Data Packages/Administrative Material (EPA Reg. No. 66330-LA)
(Active Ingredient name: beta-D-Allofuranuronic acid, 2-(2-amino-5-o-(aminocarbonyl)-2-deoxy-L-xylor/Polyoxin-D zinc salt)

Division RAL for this package: Andy Bryceland

Passed: Screen: Nasrin Begum

Admin Materials	Signed		Date	Absent	Comments
	Yes	No			
Form 8570-1	X		7/21/04		68173-1
CSF - Completely filled out & original signature (EPA Form 8570-4)	X		6/8/04		
Method of Support	X		7/21/04		Selective method
Label				X	NA
Physical address of manufacturer on label	X				Present at the last page instead of front page
Data Matrix - Two/one for jacket; one for FOIA (EPA Form 8570-35)	X		7/21/04		
Formulator's exemption form (EPA Form 8570-27)					
Transmittal letters	X		7/28/04		
Petition/amended petition if food tolerance or exemption/amended food tolerance or exemption					
FR template if food tolerance or exemption/amended food tolerance or exemption					
Certification with Respect to Citation of Data Form (EPA Form 8570-34) - if required	X		7/21/04		
Minutes on data requirements (pre-registration meeting)					
Active ingredient # (i.e. Chemical PC code)					PC Code: 230000
Jacket from EPA Identifying Symbol					66330-LA
Are MRIDS assigned? (State Yes/No in comments)					Yes
Background Experimental Use Permit information, if applicable				X	NA

Additional Comments:

BPPD Screen Package

B67

Andy
Non FAST Team

Front End (Team Leader Hollis)

Product Name: Alaenim 2012

File Symbol No. ~~55116~~ 66330-LA

Active Ingredient: Polyoxin D

☐ FOOD

☒ Non-FOOD

Date In BPPD: 8/13

☐ New Submission

Date To Screen Team: 8/26

☐ Resubmission

Package (RAL)

Pre-Registration Meeting Minutes: ☐ Yes ☐ None

See Administrative Material Checklist for information and comments on label, CSF, forms, etc.

Comment:

Jacket: ☐ Attached ☐ Not Present for Science Screen

Science Screen

Scientist:

Administrative Screen: ☐ Pass ☐ Fail

Science Screen: ☐ Pass ☐ Fail



Linda - Jim Hollins said
this was in the "Transfer"
bin for jackets on 2nd Fl.
but they didn't understand
why/what to do with this -
Sheyl



Arvesta Corporation
100 First Street, Suite 1700
San Francisco, CA 94105
Tel: (415) 535-3480
Fax: (415) 284-5683
www.arvesta.com

July 21, 2004

Denise Greenway
Biopesticide and Pollution Prevention Division
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1801 Bell Street
Arlington, VA 22202-4501

RE: Registration of a new product – Endorse WDG
(EPA Reg. No. 68173-xx and EPA Reg. No. 66330-xx)

Dear Ms. Greenway:

Arvesta Corporation (EPA Company Number 66330), as an agent for Kaken Pharmaceuticals (EPA Company Number 68173) and on its own behalf, is submitting this petition for registration of a new formulation containing the active ingredient Polyoxin D Zinc Salt (EPA Reg. No. 68173-1). The new product name is ENDORSE Water Dispersible Granules with a content of 11.3% active ingredient. ENDORSE WDG will have the same uses as the previously registered product ENDORSE Wettable Powder Turf Fungicide (EPA Reg. No. 68173-2 and 66330-41). Arvesta is pleased to submit the following items in support of this request:

1. Administrative Documents
 - Arvesta Application form for ENDORSE WDG
 - Kaken Application form for ENDORSE WDG
 - Confidential Statement of Formula (Kaken)
 - Confidential Statement of Formula (Arvesta)
 - Data transmittal document listing studies being submitted
 - Certification with Respect of Citation of Data (EPA Form 8570-34, 9-97) with attached Data Matrix (Kaken)
 - Certification with Respect of Citation of Data (EPA Form 8570-34, 9-97) with attached Data Matrix (Arvesta)
 - Letter from Kaken Pharmaceuticals authorizing Arvesta Corporation as their agent in all matters regarding Polyoxin D Zinc Salt
 - 5 copies of the ENDORSE WDG label (Kaken)
 - 5 copies of the ENDORSE WDG label (Arvesta)

2. Supporting Data:

- Three copies of each study report as listed in the Data Transmittal Document.

Due to the fact that the active ingredient content in the technical grade Polyoxin D zinc salt is very low (23.8% nominal) elected to have certified limits at 5% to better control the production.

Please notify Arvesta of the receipt of these documents and the MRID numbers assigned to each of the studies submitted. We would greatly appreciate receiving the Agency reviewer's comments as soon as they become available. If you have any questions or need other assistance in this matter, please contact me at (415) 778-4876 (dbujor@arvesta.com).

Sincerely,



Doina Bujor
Project Manager - Polyoxin
Registrations and Regulatory Affairs
Arvesta Corporation

TRANSMITTAL DOCUMENT

Data Submitter: Arvesta Corporation
as agent for Kaken Pharmaceutical Co., Inc.
and
Arvesta Corporation
100 First Street, Suite 1700
San Francisco, CA 94105

Regulatory Action: NEW PRODUCT
Endorse Water Dispersible Granule

Transmittal Date: July 21, 2004

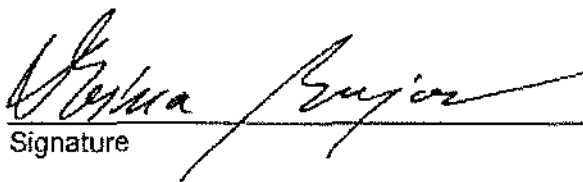
LIST OF STUDIES

Volume 1 46340201	OPPTS Guideline 830.1550; 830.1600; 830.1620; 830.1650; 830.1670; 830.1700; 830.1750; 830.1800; 830.1900	U.S. EPA Product Properties Test Guidelines – Group A and B of Endorse WDG. Group A – Product Identity, Composition, and Analysis. Group B – Physical and Chemical Properties, S. Comes, Y. Li, K. Baldwin, June 14, 2004.
Volume 2 46340202	OPPTS Guideline 870.1100	An Oral Acute Toxicity Study of Polyoxin Z Dry Flowable in Rats, S. Oda, August 30, 1996.
Volume 3 46340203	OPPTS Guideline 870.1200	A Dermal Acute Toxicity Study of Polyoxin Z Dry Flowable in Rats, S. Oda, August 30, 1996.
Volume 4 Admin	OPPTS Guideline 870.1300	Endorse DF. Acute Toxicity Inhalation Study Waiver Requests, J. Kinzell, C. Ma.
Volume 5 46340204	OPPTS Guideline 870.2400	A Primary Eye Irritation Study of Polyoxin Z Dry Flowable in Rabbits, R.

		Shibata, October 22, 1996.
Volume 6 48340205	OPPTS Guideline 870.2500	A Primary Dermal Irritation Study of Polyoxin Z Dry Flowable in Rabbits, R. Shibata, October 22, 1996.
Volume 7 48340206	OPPTS Guideline 870.2600	A Skin Sensitization Study of Polyoxin Z Dry Flowable in Guinea Pigs, R. Shibata, October 22, 1996.

Submitted by:

Doina Bujor
Project Manager
Arvesta Corporation
100 First Street, Suite 1700
San Francisco, CA 94105
(415)-778-4876


Signature



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

August 12, 2004

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

ARVESTA CORPORATION
KAKEN PHARMACEUTICAL CO LTD
100 FIRST STREET, SUITE 1700
SAN FRANCISCO, CA 94105

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 11-AUG-04. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

MEMORANDUM

DATE: 8/12/04

TO: DENISE GREENWAY Regulatory Manager
PM 91, BPPD

FROM: Information Services Branch, IRSD

Your receipt of this data submission is not an indication that MRIDs for the enclosed studies have been posted in OPPIN.

We expect that it will be approximately 5 days from the above date before the study-level data is available in OPPIN.

If you have any questions about this process, please contact Maureen Sherrill (305-5361) or Teresa Downs (305-5363).

This is a: ☒ fully accepted submission
☐ partially accepted submission
☐ rejected submission

MEMORANDUM

DATE: ____/____/____

TO: _____, Regulatory Manager

FROM: Information Services Branch, IRSD

● Your receipt of this data submission is not an indication that MRIDs for the enclosed studies have been posted in OPPIN.

● We expect that it will be approximately two weeks from the above date before the study-level data is available in OPPIN.

If you have any questions about this process, please contact Maureen Sherrill (305-5361) or Teresa Downs (305-5363).

This is a: ☐ fully accepted submission
☐ partially accepted submission
☐ rejected submission

8/5/04

TRAVELLO -

Tevesa Downs and I

Spoke w/ Doina Bajor
about deficiencies.

They will: probably resubmit
page 3 again for Volume 3

and resubmit the remaining
volumes because signature
and page numbering issues

- Please save this for now.

Thanks!

Susan Cervelli



Arvesta

Arvesta Corporation
 00 First Street, Suite 1700
 San Francisco, CA 94105
 tel (415) 536-3480
 fax (415) 284-9884
www.arvesta.com

Check w/ Truvello
 bone: phone message
 66330-LA
 86-51440

TRANSMISSION

Date: 7-29-04	Name: Doina Bujor
Company: EPA	
Attention: Susanne Cerelli	cc:
Fax#: 703-305-0118	
Number of pages (including cover): 2	

Subject: Endorse WDG

Susanne,
 Per our phone conversation I am sending the
 GLP page for the product chemistry report
 for Endorse WDG (EPA Reg # 66330-LA)
 Please let me know if you need anything else.
 phone: 415-778-4876
 e-mail: dbujor@arvesta.com.


Best regards
 Doina

Arvesta Corporation
TMN-0213
Page 3

GLP COMPLIANCE STATEMENT

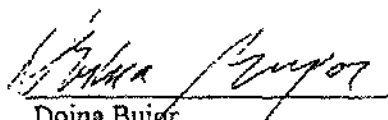
Necessary Good Laboratory Practice pages can be found with the individual studies.

Study Director:


Stephen Cornes
Formulation Specialist

7/29/04
Date

Submitter / Sponsor:


Doina Bujor
Project Manager

7-29-04
Date

MEMORANDUM

DATE: 07/27/04

TO: BPPD (91), Regulatory Manager

FROM: Information Services Branch, IRSD

Your receipt of this data submission is not an indication that MRIDs for the enclosed studies have been posted in OPPIN.

We expect that it will be approximately 5 days from the above date before the study-level data is available in OPPIN.

If you have any questions about this process, please contact Maureen Sherrill (305-5361) or Teresa Downs (305-5363).

This is a: ☐ fully accepted submission
☐ partially accepted submission
☒ rejected submission

MEMORANDUM

DATE: ____/____/____

TO: _____, Regulatory Manager

FROM: Information Services Branch, IRSD

● Your receipt of this data submission is not an indication that MRIDs for the enclosed studies have been posted in OPPIN.

● We expect that it will be approximately two weeks from the above date before the study-level data is available in OPPIN.

If you have any questions about this process, please contact Maureen Sherrill (305-5361) or Teresa Downs (305-5363).

This is a: ☐ fully accepted submission
☐ partially accepted submission
☐ rejected submission



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

July 27, 2004

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

ARVESTA CORPORATION
100 FIRST STREET, SUITE 1700
SAN FRANCISCO, CA 94105

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 22-JUL-04. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

We are unable to accept your data submittal for further processing and review, because of the significant deficiencies noted below. It is being returned to you for correction. If deficiencies were found which apply to your overall submission, they are described immediately following this paragraph. If problems are found with individual studies, they are described below linked to the study identifier found on the enclosed copy of your bibliography.

Rejected Study [01]:

* A statement of compliance or non-compliance with the Good Laboratory Practices Standards contained in 40 CFR 160 is required for all studies (except range finding studies and supplements to previously submitted studies) submitted to EPA. This statement must appear as page 3 of all studies, and must be signed and dated by the study sponsor, the study submitter, and the study director. Please see 40 CFR 160.12 for specific guidance.

* As per the Code of Federal Regulations title 40 part 160 — Good Laboratory Practice Standards, studies requiring a Good Laboratory Practice (GLP) compliance statement have been expanded to include efficacy studies and physical and chemical characterization studies; see 40 CFR 160.3 and 160.135. Therefore, you must submit a statement of compliance or noncompliance with the Good Laboratory Practice Standards as described in 40 CFR 160.12.

Rejected Study [02]:

* A statement of compliance or non-compliance with the Good Laboratory Practices Standards contained in 40 CFR 160 is required for all studies (except range finding studies and supplements to previously submitted studies) submitted to EPA. This statement must appear as page 3 of all studies, and must be signed and dated by the study sponsor, the study submitter, and the study director. Please see 40 CFR 160.12 for specific guidance.

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* A statement of compliance or non-compliance with the Good Laboratory Practices Standards contained in 40 CFR 160 is required for all studies (except range finding studies and supplements to previously submitted studies) submitted to EPA. This statement must appear as

page 3 of all studies, and must be signed and dated by the study sponsor, the study submitter, and the study director. Please see 40 CFR 160.12 for specific guidance.

Rejected Study [04]:

* A statement of compliance or non-compliance with the Good Laboratory Practices Standards contained in 40 CFR 160 is required for all studies (except range finding studies and supplements to previously submitted studies) submitted to EPA. This statement must appear as page 3 of all studies, and must be signed and dated by the study sponsor, the study submitter, and the study director. Please see 40 CFR 160.12 for specific guidance.

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* A statement of compliance or non-compliance with the Good Laboratory Practices Standards contained in 40 CFR 160 is required for all studies (except range finding studies and supplements to previously submitted studies) submitted to EPA. This statement must appear as page 3 of all studies, and must be signed and dated by the study sponsor, the study submitter, and the study director. Please see 40 CFR 160.12 for specific guidance.

Rejected Study [06]:

* A statement of compliance or non-compliance with the Good Laboratory Practices Standards contained in 40 CFR 160 is required for all studies (except range finding studies and supplements to previously submitted studies) submitted to EPA. This statement must appear as page 3 of all studies, and must be signed and dated by the study sponsor, the study submitter, and the study director. Please see 40 CFR 160.12 for specific guidance.



Arvesta Corporation
100 First Street, Suite 1700
San Francisco, CA 94105
Tel: (415) 536-3485
Fax: (415) 264-9863
www.arvesta.com

July 21, 2004

Denise Greenway
Biopesticide and Pollution Prevention Division
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1801 Bell Street
Arlington, VA 22202-4501

**RE: Registration of a new product – Endorse WDG
(EPA Reg. No. 68173-xx and EPA Reg. No. 66330-xx)**

Dear Ms. Greenway:

Arvesta Corporation (EPA Company Number 66330), as an agent for Kaken Pharmaceuticals (EPA Company Number 68173) and on its own behalf, is submitting this petition for registration of a new formulation containing the active ingredient Polyoxin D Zinc Salt (EPA Reg. No. 68173-1). The new product name is ENDORSE Water Dispersible Granules with a content of 11.3% active ingredient. ENDORSE WDG will have the same uses as the previously registered product ENDORSE Wettable Powder Turf Fungicide (EPA Reg. No. 68173-2 and 66330-41). Arvesta is pleased to submit the following items in support of this request:

1. Administrative Documents

- Arvesta Application form for ENDORSE WDG
- Kaken Application form for ENDORSE WDG
- Confidential Statement of Formula (Kaken)
- Confidential Statement of Formula (Arvesta)
- Data transmittal document listing studies being submitted
- Certification with Respect of Citation of Data (EPA Form 8570-34, 9-97) with attached Data Matrix (Kaken)
- Certification with Respect of Citation of Data (EPA Form 8570-34, 9-97) with attached Data Matrix (Arvesta)
- Letter from Kaken Pharmaceuticals authorizing Arvesta Corporation as their agent in all matters regarding Polyoxin D Zinc Salt
- 5 copies of the ENDORSE WDG label (Kaken)
- 5 copies of the ENDORSE WDG label (Arvesta)

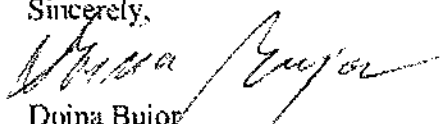
2. Supporting Data:

- Three copies of each study report as listed in the Data Transmittal Document.

Due to the fact that the active ingredient content in the technical grade Polyoxin D ^{fine} salt is very low (23.8% nominal) elected to have certified limits at 5% to better control the production.

Please notify Arvesta of the receipt of these documents and the MRID numbers assigned to each of the studies submitted. We would greatly appreciate receiving the Agency reviewer's comments as soon as they become available. If you have any questions or need other assistance in this matter, please contact me at (415) 778-4876 (dbujor@arvesta.com).

Sincerely,



Doina Bujor
Project Manager – Polyoxin
Registrations and Regulatory Affairs
Arvesta Corporation

TRANSMITTAL DOCUMENT

Data Submitter: Arvesta Corporation
as agent for Kaken Pharmaceutical Co., Inc.
and
Arvesta Corporation
100 First Street, Suite 1700
San Francisco, CA 94105

Regulatory Action: NEW PRODUCT
Endorse Water Dispersible Granule

Transmittal Date: July 21, 2004

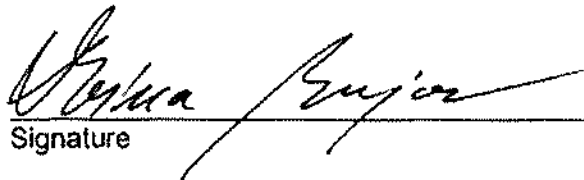
LIST OF STUDIES

Volume 1 Reject (01)	OPPTS Guideline 830.1550; 830.1600; 830.1620; 830.1650; 830.1670; 830.1700; 830.1750; 830.1800; 830.1900	U.S. EPA Product Properties Test Guidelines – Group A and B of Endorse WDG. Group A – Product Identity, Composition, and Analysis. Group B – Physical and Chemical Properties, S. Cornes, Y. Li, K. Baldwin, June 14, 2004.
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Volume 4 Admin	OPPTS Guideline 870.1300	Endorse DP: Acute Toxicity Inhalation Study Waiver Requests, J. Kinzell, C. Ma.
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		Shibata, October 22, 1996.
Volume 6 Reject (05)	OPPTS Guideline 870.2500	A Primary Dermal Irritation Study of Polyoxin Z Dry Flowable in Rabbits, R. Shibata, October 22, 1996.
Volume 7 Reject (06)	OPPTS Guideline 870.2600	A Skin Sensitization Study of Polyoxin Z Dry Flowable in Guinea Pigs, R. Shibata, October 22, 1996.

Submitted by:

Doina Bujor
Project Manager
Arvesta Corporation
100 First Street, Suite 1700
San Francisco, CA 94105
(415)-778-4876


Signature



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

July 28, 2004

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

PLEASE RETURN A COPY OF THIS LETTER WITH PAYMENT

OPP Decision Number: D-346783
EPA File Symbol or Registration Number: 66330-LA
Product Name: ENDORSE WATER DISPERSIBLE GRANULES
EPA Receipt Date: 22-Jul-2004
EPA Company Number: 66330
Company Name: ARVESTA CORPORATION

DOINA BUJOR
ARVESTA CORPORATION
100 FIRST STREET, SUITE 1700
SAN FRANCISCO, CA 94105

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application for registration. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: B67

NEW PRODUCT;NON-FAST TRACK;MICROBIAL/BIOCHEMICAL;

Please remit payment in the amount of: \$ 4,000 to:

By USPS:
USEPA Washington Finance Center
Pesticide Registration Service Fee
PO Box 360277
Pittsburgh, PA 15251

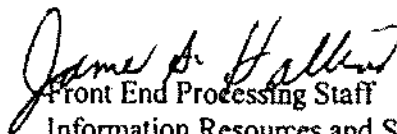
By Courier:
U.S. EPA Washington Finance Center
Pesticide Registration Service Fee
C/O Mellon Client Service Center
500 Ross Street, Room 670
Box 360277
Pittsburgh, PA 15251-6277
Attn: EPA Module Supervisor
Telephone: (412) 236-2294

All payments must be in United States currency by check, bank draft, or money order drawn to the order of the Environmental Protection Agency. To ensure proper credit, please write the OPP DECISION NUMBER on your check, and enclose a copy of this letter with your payment.

You may be eligible for a full or partial waiver of the registration service fee if, for example, you qualify as a small business or are applying for a minor use, or if your application is solely associated with an IR-4 tolerance petition. Please be advised that if you intend to request a waiver, you must do so in writing within 15 days of receipt of this invoice instead of remitting the amount indicated above. OPP will not consider waiver requests after the registration service fee has been paid. Information regarding eligibility and how to request and document a fee waiver is available on the OPP Fee for Service web site at www.epa.gov/pesticides/fees.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 308-8260.

Sincerely,



Front End Processing Staff
Information Resources and Services Division

Fee for Service

This package includes the following

for Division

☒ New FFS Action

☐ Amendment

☐ Waiver Request

☐ Voluntary Payment Request

☒ RD

☐ AD

☒ BPPD

Receipt Nos. S- 764599

Product/Risk Manager: 91

EPA File Symbol/Reg. No. 66330-LA

Pin-Punch Date: 7/22/04

☐ This item is NOT subject to FFS action.

Action Code: B67

Amount Due: \$ 4,000

Voluntary Payment Reduction Amount:

☐ 0%

☐ 40%

☐ 80%

Original Decision #:

☐ 10%

☐ 50%

☐ 90%

☐ 20%

☐ 60%

☐ 100%

☐ 25%

☐ 70%

☐ Other

D- _____

☐ 30%

☐ 75%

_____%

Reviewer: S. Ruff

Date: 7/27/04

Remarks:



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

July 28, 2004

Dear :Doina Bujor

Subject: Registration #66330-LA *and 68173-G D Greenway 9/23/04*

The Biopesticides and Pollution Prevention Division (BPPD) has received your submission to register the subject product. All of the data were rejected by Document Processing because they were not submitted as directed in PR Notice 86-5 and should be reformatted and resubmitted to the Document Processing. Enclosed you will find a copy of PR Notice 86-5 which will assist you in making the necessary changes.

If you still want to register this product, the application will be kept open for a period of 75 days to give you an opportunity to respond to this memorandum. If you find that you need more time you should request an extension for a reasonable stated period of time. If you do not comply with this procedure, the Agency may administratively withdraw your application from further consideration. Under the provisions of PR Notice 75-4 of August 27, 1975, the Agency can close this application without contacting you further. Once this is done, you will have to submit a completely new application should you wish to pursue the registration of your product after the application has been withdrawn.

If you have any questions regarding this matter, you may contact :Susanne Cerrelli, Team Leader Microbial Pesticides Branch, at (703) 308-8077

Sincerely,

Trauvello Bethea, (703) 308-8714
Information Management Coordinator
Biopesticides and Pollution Prevention
Division (7511C)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

July 27, 2004

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

ARVESTA CORPORATION
KAKEN PHARMACEUTICAL CO LTD
AGROCHEMICALS & ANIMAL HEALTH DEPT.
100 FIRST STREET, SUITE 1700
SAN FRANCISCO, CA 94103

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 22-JUL-04. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

We are unable to accept your data submittal for further processing and review, because of the significant deficiencies noted below. It is being returned to you for correction. If deficiencies were found which apply to your overall submission, they are described immediately following this paragraph. If problems are found with individual studies, they are described below linked to the study identifier found on the enclosed copy of your bibliography.

Rejected Study [01]:

* A statement of compliance or non-compliance with the Good Laboratory Practices Standards contained in 40 CFR 160 is required for all studies (except range finding studies and supplements to previously submitted studies) submitted to EPA. This statement must appear as page 3 of all studies, and must be signed and dated by the study sponsor, the study submitter, and the study director. Please see 40 CFR 160.12 for specific guidance.

* As per the Code of Federal Regulations title 40 part 160 -- Good Laboratory Practice Standards, studies requiring a Good Laboratory Practice (GLP) compliance statement have been expanded to include efficacy studies and physical and chemical characterization studies; see 40 CFR 160.3 and 160.135. Therefore, you must submit a statement of compliance or noncompliance with the Good Laboratory Practice Standards as described in 40 CFR 160.12.

Rejected Study [02]:

* A statement of compliance or non-compliance with the Good Laboratory Practices Standards contained in 40 CFR 160 is required for all studies (except range finding studies and supplements to previously submitted studies) submitted to EPA. This statement must appear as page 3 of all studies, and must be signed and dated by the study sponsor, the study submitter, and the study director. Please see 40 CFR 160.12 for specific guidance.

Rejected Study [03]:

* A statement of compliance or non-compliance with the Good Laboratory Practices

Standards contained in 40 CFR 160 is required for all studies (except range finding studies and supplements to previously submitted studies) submitted to EPA. This statement must appear as page 3 of all studies, and must be signed and dated by the study sponsor, the study submitter, and the study director. Please see 40 CFR 160.12 for specific guidance.

Rejected Study [04]:

* A statement of compliance or non-compliance with the Good Laboratory Practices Standards contained in 40 CFR 160 is required for all studies (except range finding studies and supplements to previously submitted studies) submitted to EPA. This statement must appear as page 3 of all studies, and must be signed and dated by the study sponsor, the study submitter, and the study director. Please see 40 CFR 160.12 for specific guidance.

Rejected Study [05]:

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Rejected Study [06]:

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Receipt for Section 3



S: 704589

Regulatory Type: Product Registration - Section 3

Registration: ☒ Yes ☐ No

Application Type: New Registration

Fee For Service: ☐ Yes ☒ No

Print Letter

Enter More Information

Company: 00300 ARVISTA CORPORATION

V

Risk Manager: Registration Division, Risk Management Team

Product #: 00310-LA Product Name: ENDORSE WATER DISPERSIBLE GRANULES

Operator:

Me Too Section 3:

Me Too Product Name:

Application Date: 21-Jul-2004

OPP Rec'd Date: 22-Jul-2004

Front End Date: 22-Jul-2004

Risk Manager Send Date:

Receipt Content:

Study

Fast Track: ☐

New ingredient: ☐

Receipt Description:

New ingredient:

Receipt Date:

New ingredient:

Receipt Date:

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

Receipt for Section 3

Reason:

Regulatory Type:

Application Type:

Company:

Risk Manager:

Product ID:

Product Name:

Ma Top Section:

Ma Top Product Name:

Application Date:

OPP Rec'd Date:

Front End Date:

Risk Manager Send Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

Print Label

Enter More Information

Receipt Content

Study

New Ingredient

Request Only

New Ingredient

Received Date

Form B

Signature Date



Arvesta Corporation
100 First Street, Suite 1200
San Francisco, CA 94105
Tel: (415) 536-3100
Fax: (415) 284-9863
www.arvesta.com

July 21, 2004

Denise Greenway
Biopesticide and Pollution Prevention Division
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1801 Bell Street
Arlington, VA 22202-4501

**RE: Registration of a new product – Endorse WDG
(EPA Reg. No. 68173-xx and EPA Reg. No. 66330-xx)**

Dear Ms. Greenway:

Arvesta Corporation (EPA Company Number 66330), as an agent for Kaken Pharmaceuticals (EPA Company Number 68173) and on its own behalf, is submitting this petition for registration of a new formulation containing the active ingredient Polyoxin D Zinc Salt (EPA Reg. No. 68173-1). The new product name is ENDORSE Water Dispersible Granules with a content of 11.3% active ingredient. ENDORSE WDG will have the same uses as the previously registered product ENDORSE Wettable Powder Turf Fungicide (EPA Reg. No. 68173-2 and 66330-41). Arvesta is pleased to submit the following items in support of this request:

1. Administrative Documents

- Arvesta Application form for ENDORSE WDG
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Due to the fact that the active ingredient content in the technical grade Polyoxin D zinc salt is very low (23.8% nominal) elected to have certified limits at 5% to better control the production.

Please notify Arvesta of the receipt of these documents and the MRID numbers assigned to each of the studies submitted. We would greatly appreciate receiving the Agency reviewer's comments as soon as they become available. If you have any questions or need other assistance in this matter, please contact me at (415) 778-4876 (dbujor@arvesta.com).

Sincerely,



Doina Bujor
Project Manager - Polyoxin
Registrations and Regulatory Affairs
Arvesta Corporation

TRANSMITTAL DOCUMENT

Data Submitter: Arvesta Corporation
as agent for Kaken Pharmaceutical Co., Inc.
and
Arvesta Corporation
100 First Street, Suite 1700
San Francisco, CA 94105

Regulatory Action: NEW PRODUCT
Endorse Water Dispersible Granule

Transmittal Date: July 21, 2004

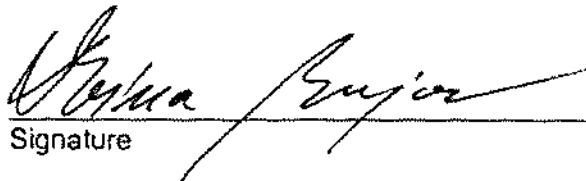
LIST OF STUDIES

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Submitted by:

Doina Bujor
Project Manager
Arvesta Corporation
100 First Street, Suite 1700
San Francisco, CA 94105
(415)-778-4876


Signature

NEW APPLICATIONS

DATE: 7/22/04

FILE NUMBER: 66330-LA

FEP (OPPIN ENTRY): 7/22/04 Bm
(Initial & date)

FILE ROOM: DP 7/28/04
(Initial & date)

SIG: KG 7/29/04
(Initial & date)

FILE ROOM: DP 7/30/04
(Initial & date)

X ASSIGN TO PM 91

Pages 203-208 Access to FIFRA Registration Data is Restricted Under FIFRA 10(g)



Arvesta Corporation
100 First Street, Suite 1700
San Francisco, CA 94105
Tel: (415) 536-3480
Fax: (415) 284-9883
www.arvesta.com

July 21, 2004

Denise Greenway
Biopesticide and Pollution Prevention Division
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1801 Bell Street
Arlington, VA 22202-4501

RE: Registration of a new product – Endorse WDG
(EPA Reg. No. 68173-xx and EPA Reg. No. 66330-xx)

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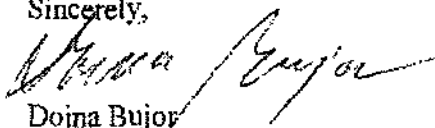
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Sincerely,



Doina Bujor
Project Manager - Polyoxin
Registrations and Regulatory Affairs
Arvesta Corporation

3% in 158.115
Note Reg's return
says up to 5%
cert limits are OK
2/2/2004
accepted

TRANSMITTAL DOCUMENT

Data Submitter: Arvesta Corporation
as agent for Kaken Pharmaceutical Co., Inc.
and
Arvesta Corporation
100 First Street, Suite 1700
San Francisco, CA 94105

Regulatory Action: NEW PRODUCT
Endorse Water Dispersible Granule

Transmittal Date: July 21, 2004

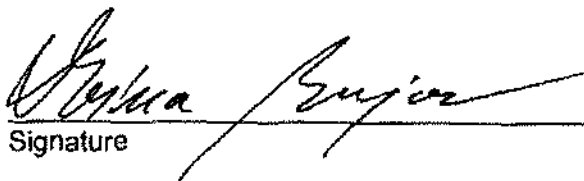
LIST OF STUDIES

Volume 1	OPPTS Guideline 830.1550; 830.1600; 830.1620; 830.1650; 830.1670; 830.1700; 830.1750; 830.1800; 830.1900	U.S. EPA Product Properties Test Guidelines – Group A and B of Endorse WDG. Group A – Product Identity, Composition, and Analysis. Group B – Physical and Chemical Properties, S. Cortes, Y. Li, K. Baldwin, June 14, 2004.
Volume 2	OPPTS Guideline 870.1100	An Oral Acute Toxicity Study of Polyoxin Z Dry Flowable in Rats, S. Oda, August 30, 1996.
Volume 3	OPPTS Guideline 870.1200	A Dermal Acute Toxicity Study of Polyoxin Z Dry Flowable in Rats, S. Oda, August 30, 1996.
Volume 4	OPPTS Guideline 870.1300	Endorse DF. Acute Toxicity Inhalation Study Waiver Requests, J. Kinzell, C. Ma.
Volume 5	OPPTS Guideline 870.2400	A Primary Eye Irritation Study of Polyoxin Z Dry Flowable in Rabbits, R.

		Shibata, October 22, 1996.
Volume 6	OPPTS Guideline 870.2500	A Primary Dermal Irritation Study of Polyoxin Z Dry Flowable in Rabbits, R. Shibata, October 22, 1996.
Volume 7	OPPTS Guideline 870.2600	A Skin Sensitization Study of Polyoxin Z Dry Flowable in Guinea Pigs, R. Shibata, October 22, 1996.

Submitted by:

Doina Bujor
Project Manager
Arvesta Corporation
100 First Street, Suite 1700
San Francisco, CA 94105
(415)-778-4876


Signature



Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060

United States Environmental Protection Agency Washington, DC 20460		<input checked="" type="checkbox"/> Registration <input type="checkbox"/> Amendment <input type="checkbox"/> Other	OPP Identifier Number
Application for Pesticide - Section I			
1. Company/Product Number 66330- <i>LA</i>		2. EPA Product Manager Denise Greenway	
4. Company/Product (Name) ENDORSE Water Dispersible Granules		3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted	
5. Name and Address of Applicant (Include ZIP Code) ARVESTA CORPORATION 100 First Street, Suite 1700 San Francisco, CA 94105 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	
Section - II			
<input type="checkbox"/> Amendment - Explain below.		<input type="checkbox"/> Final printed labels in response to Agency letter dated _____	
<input type="checkbox"/> Resubmission in response to Agency letter dated _____		<input type="checkbox"/> "Me Too" Application.	
<input type="checkbox"/> Notification - Explain below.		<input type="checkbox"/> Other - Explain below.	
Explanation: Use additional page(s) if necessary. (For section I and Section II.)			
Section - III			
1. Material This Product Will Be Packaged in:			
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. _____ No. per container _____	If "Yes" Package wgt. _____ No. per container _____
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 2.4 lb	
5. Location of Label Directions <input type="checkbox"/>		6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph Paper glued Stenciled <input type="checkbox"/> Other _____	
Section - IV			
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Doina Bujor		Title Project Manager	
		Telephone No. (Include Area Code) 415-778-4876	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Project Manager	
4. Typed Name Doina Bujor		5. Date July 21, 2004	



科研製藥株式会社

〒113-8650
東京都文京区本郷2-8-11 本郷ビル

KAKEN PHARMACEUTICAL CO., LTD.

28-8, HONKOMAGOME 2-CHOME, BUNKYO-KU, TOKYO 113-8650, JAPAN

June 25, 2004

Denise Greenway
Product Manager
Biopesticide and Pollution Prevention Division (7511C)
Environmental Protection Agency
1801 Bell Street
Arlington, Va. 22202

Re: Authorized Agent

Dear Ms Greenway:

We, Kaken Pharmaceutical Co., Ltd. located at 28-8, Honkomagome 2-Chome, Bunkyo-Ku, Tokyo 113-8650, Japan, EPA company number 68173, certify and designate Arvesta Corporation located at 100 First Street, Suite 1700, San Francisco, California 94105, EPA company number 66330, as our authorized agent in all matters regarding Polyoxin D zinc salt technical and its end use products.

Please direct any questions and correspondence to Doina Bujor, Project Manager, Registration and Regulatory Affairs at Arvesta Corporation.

e-mail: dbujor@arvesta.com

phone: 415-778-4876

fax: 415-284-9884

Sincerely,

Masahiro Hori, Ph.D.

Executive Director

Agrochemicals and Animal Health Products Department

Kaken Pharmaceutical Co., Ltd.

Cc: Doina Bujor (Arvesta)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for notification and special review activities, including the time for reviewing the instructions and completing the necessary forms. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division, 2022R1, U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Creation of Data

Applicant/Registrant's Name, Address, and Telephone Number
Arvesta Corporation, 100 First St., Suite 1700, San Francisco, CA 94105, 415-778-4676

EPA Registration Number/File Symbol
66330- E/c

Active Ingredient(s) and/or representative test compound(s)

Polyoxin D Zinc Salt

Date
July 21, 2004

General Use Pattern(s) (list all those claimed for the product using 40 CFR Part 150)
Terrestrial nonfood crop

Product Name
ENDORSE Water Dispersible Granules

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product listed for all the same uses on your label you do not need to submit this form. You must submit the Form when the Exemption Statement (EPA Form 8570-271).

☐ I am responding to a Data Call-in Notice, and have included with this form a list of companies sent notices of non-petition; the Data Bank form should be used for this purpose(s).

SECTION II: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the data method of support, and have included with this form a list of companies sent notices of non-petition; the Data Bank form should be used for this purpose(s).

☒ I am using the selective method of support (active selection under the selective method), and have included 3 in this form a completed list of data requirements; the Data Bank form must be used.

SECTION III: GENERAL OFFER TO PAY

Required: I am using the data method or when using the selective method under the selective method to satisfy one or more data requirements.

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FFA.

SECTION IV: CERTIFICATION

I certify that this application for registration, this form for registration, or its Data Call-in response is supported by all data submitted in the application for registration, the form for registration, or its Data Call-in response. In addition, if the selective method or selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application (the application sought the full registration of a product's chemical or its composition and uses).

I certify that each exclusive use study cited in support of this registration or registration that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that each study cited in support of this registration or registration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all persons of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3 (d)(1)-(4) and (e) of FFA, and (ii) to enter into negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3 (d)(1)-(4) and (e) of FFA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may, in that action to deny, cancel or suspend the registration of my product in conformity with FFA.

I certify that the statements I have made on this form and all attachments to this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.

Signature

Doina Bujor

Date

July 21, 2004

Typed or Printed Name and Title

Doina Bujor / Project Manager



Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

Date: July 21, 2004

EPA Reg No./File Symbol 66330-XX CA

Page 1 of 2

Applicant's/Registrant's Name & Address

Arvesta Corporation
100 First Street, Suite 1700 San Francisco, CA 94105

Product

Endorse Water Dispersible Granule (WDG)

Ingredient Polyoxin D Zinc Salt

[illegible]

EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.

Agency Internal Use Copy

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ENDORSE® Water Dispersible Granule

GROUP	19	FUNGICIDE
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ACTIVE INGREDIENT:

Polyoxin D zinc salt 11.3%

OTHER INGREDIENTS: 88.7%

TOTAL..... 100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

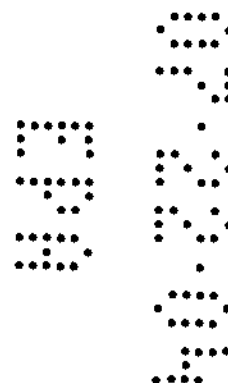
SEE SIDE/BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Causes moderate eye irritation. Harmful if absorbed through the skin, swallowed or inhaled. Avoid contact with skin, eyes or clothing. Avoid breathing dust or spray mist. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.



FIRST AID	
If on skin or clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
If swallowed	<ul style="list-style-type: none"> • Call poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
<p align="center">FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE: CALL 1-800-228-5635 Ext. 174</p>	

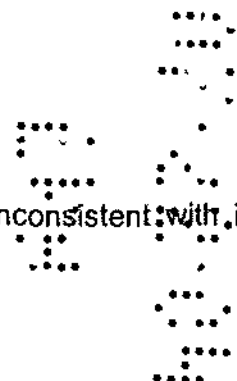
ENVIRONMENTAL HAZARDS

This product is moderately toxic to aquatic invertebrates and fish. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment wash waters. Do not allow runoff into lakes, streams, ponds or public waterways.

EPA Reg. No. 66330-____
 EPA EST. No. ____
 Net weight 2.4 lbs

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.



GENERAL INFORMATION

ENDORSE Water Dispersible Granule is NOT for use on turf being grown (1) for sale or other commercial use as sod, (2) for commercial seed production, or (3) for research purposes.

ENDORSE Water Dispersible Granule is for use on golf courses, residential lawns, parks, commercial and institutional grounds composed of cool and warm season grasses such as Bluegrass, Bentgrass, Fescue, Ryegrass, Zoysiagrass, or their mixtures.

ENDORSE Water Dispersible Granule is a systemic, foliar applied turf fungicide for control of **Brown Patch** and **Large Patch** caused by *Rhizoctonia* spp. ENDORSE Water Dispersible Granule also controls **Cool Weather Brown Patch (Yellow Patch)** (*Rhizoctonia cerealis*), **Foliar and Basal Anthracnose** (*Colletotrichum graminicola*), **Gray Snow Mold** (*Typhula ishikariensis* and *Typhula incarnata*), **Leaf Spot/Melting Out** (*Dreschlera poae*), **Pink Snow Mold** (*Microdochium nivale*), **Red Thread** (*Laelisaria fuciformis*), **Rhizoctonia Damping Off** (*Rhizoctonia solani*), and **Zoysia Patch** (*Rhizoctonia solani*) on cool and warm season turf grasses.

ENDORSE Water Dispersible Granule also aids in the suppression of **Gray Leaf Spot** (*Pyricularia grisea*).

Apply ENDORSE Water Dispersible Granule as a preventive or curative treatment in conjunction with good turf management practices.

RESISTANCE MANAGEMENT RECOMMENDATIONS

ENDORSE Water Dispersible Granule contains a Group 19 fungicide. Fungal isolates with acquired resistance to Group 19 may eventually dominate the fungal population if Group 19 fungicides are used repeatedly in the same field or in successive years as the primary method of control for targeted species. This may result in partial or total loss of control of those species by ENDORSE Water Dispersible Granule or other Group 19 Fungicides.

To delay fungicide resistance, consider:

- Avoiding the consecutive use of ENDORSE Water Dispersible Granule or other target site of action Group 19 fungicides that have a similar target site of action, on the same pathogens.
- Using tank-mixtures or premixes with fungicides from different target site of action Groups as long as the involved products are all registered for the same use and are both effective at the tank mix or prepack rate on the pathogen(s) of concern.
- Basing fungicide use on a comprehensive IPM program.
- Monitoring treated fungal populations for loss of field efficacy.
- Contacting your local extension specialist, certified crop advisors, and/or manufacturer for fungicide resistance management and/or IPM recommendations for specific crops and resistant pathogens.

MIXING AND APPLICATION

When diseases not specified on this label, such as Dollar Spot, are present or expected, it is appropriate to mix ENDORSE Water Dispersible Granule with appropriately labeled fungicides. When tank mixing ENDORSE Water Dispersible Granule with other products, observe all precautions and limitations on each separate product label. It is always advisable to conduct a tank mix compatibility test when you plan to mix this product with other products. To determine the physical compatibility of this product with other products, use a jar test. Using a quart jar, add the proportionate amounts of the products to approximately one quart of water with agitation. Add dry formulations first, then flowables, then emulsifiable concentrates last. After thorough mixing, allow this mixture to stand for 5 minutes. If the combination remains mixed or can be readily remixed, it is physically compatible. Once compatibility has been proven, use the same procedure for adding required ingredients to the spray tank. Use combinations on a small number of plants before treating large areas.

Do not apply this product through any type of irrigation system.

Mixing instructions for ENDORSE Water Dispersible Granule:

- Fill spray tank to $\frac{1}{2}$ of the intended final volume.
- Start spray tank agitation.
- Add the appropriate amount of product to the tank (refer to Rate and Schedule section of label). Follow the directions above for mixing other products in the spray tank.
- Agitate to ensure thorough mixing while adding the remaining required water.
- DO NOT allow the spray mixture to stand without agitation.

Mix only the amount of spray solution needed to treat the desired area.

For optimum control of labeled diseases, apply ENDORSE Water Dispersible Granule with sufficient water to provide a thorough coverage.

Irrigation or rainfall soon after treatment with ENDORSE Water Dispersible Granule will decrease disease control. For best control, do not irrigate for 12 hours after treatment.

For best results, apply after mowing.

RATE AND SCHEDULE

Apply 2.4 lbs (1 bag) of ENDORSE Water Dispersible Granule per acre (0.27 lbs active ingredient/acre) in a minimum of 88 gallons of water per acre.

Repeat treatment on a 7-14 day schedule as necessary when environmental conditions are conducive to development of disease. When disease symptoms are present, best control will be achieved by using a shorter interval.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store in dry place away from food or feed.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed, by State and local authorities, by burning. If burned, stay out of smoke.

**FOR 24-HOUR CHEMICAL EMERGENCY
(Spill, Leak, Fire or Accident) ASSISTANCE:
CALL CHEMTREC 1-800-424-9300**

CONDITIONS OF SALE

1. Arvesta Corporation warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in accordance with the Directions for Use under normal conditions of use.
2. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Arvesta. **ARVESTA DISCLAIMS ALL OTHER WARRANTIES, EXPRESSED OR IMPLIED, INCLUDING ANY WARRANTY OF FITNESS OR MERCHANTABILITY. SELLER SHALL NOT BE LIABLE FOR CONSEQUENTIAL SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. TO THE EXTENT PERMITTED BY LAW, SELLER'S LIABILITY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE. ARVESTA DOES NOT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTY, GUARANTEE OR REPRESENTATION CONCERNING THIS PRODUCT.**
3. Critical and unforeseeable factors beyond Arvesta's control prevent Arvesta from eliminating all risks in connection with the use of this product. Such risks include, but are not limited to, damage to plants and crops to which the product is applied, lack of complete control, and damage caused by drift to other plants or crops. Such risks occur even though the product is reasonably fit for the use stated on the label and even though label directions are followed. Except as stated in 1 above, Buyer and User acknowledge and assume all risks and liabilities resulting from handling, storage, and use of this product.

ENDORSE® is a registered trademark of Arvesta Corporation.

Produced for:
Arvesta Corporation
100 First Street, Suite 1700
San Francisco, CA 94105

